



To: Bjorn

Fax: 512-244-0853

From: Bill Baber & Adam Moran

Date: 5/10/12

Re: U Pick It

Pages: 87

☐ Urgent ☐ For Review ☐ Please Reply

Contact: Bill Baber 402-957-6498 or Adam Moran 913-207-7879



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAR 21 2012

Mr. Adam Moran
General Manager
U-Pick-It
7700 East Winner Road
Kansas City, Missouri 66103

RE: U-Pick-It
Kansas City, Missouri
EPA RCRA ID No.: Non-notifier

Dear Mr. Moran:

On February 9-10, 2012, a representative of the U.S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of the inspection report is enclosed for your information.

The EPA is presently reviewing the findings of the report to determine your facility's compliance with the applicable statutes, permits, or regulations. If it is determined that violations exist, the EPA reserves all rights it may have to take appropriate enforcement action, regardless if any violations were subsequently corrected.

If there are any questions regarding this report or actions that you may want to take, please contact me at (913) 551-7164.

Sincerely,

A handwritten signature in dark ink, appearing to read "DMB", is written over a horizontal line.

Deborah Bredehoff
Compliance Officer
Waste Enforcement and Materials Management Branch

Enclosure

cc: Mr. Dennis Hansen, Missouri Department of Natural Resources
Missouri Department of Natural Resources Kansas City Regional Office

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

U-PICK-IT

7700 E. Winner Road
Kansas City, MO 66103
(816) 241-7548

EPA ID Number: Non-notifier

ON

February 9-10, 2012

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Services Division

1.0 INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection at U-Pick-It (UPI) located in Kansas City, MO on 2/9-10/2012. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. I conducted the inspection as a Level B Multi-Media Inspection and the Multi-Media Screening Checklist is included as attachment 1. Based on the information obtained during the course of the inspection, I inspected the facility as a non-generator of known hazardous waste, used oil generator, used oil collection center, and small quantity handler of universal waste. However, additional hazardous waste determinations need to be made that may affect the non-generator status determination. According to the EPA RCRAInfo database, this facility has not been previously inspected.

2.0 PARTICIPANTS

U-Pick-It, Kansas City, MO (UPI-KCMO):

Adam Moran, General Manager (about three years in position and five years with the company)

Nick Tordoff, Assistant General Manager (about four years in position and nine years with the company)

(See attachment 2 for copy of business cards.)

U.S. Environmental Protection Agency (EPA):

Dedriel L. Newsome, Environmental Engineer

3.0 INSPECTION PROCEDURES

On 2/9/2012 at about 9:00A.M., I arrived at UPI-KCMO and met Mr. Moran. I explained the purpose and procedures of the inspection and presented him with my EPA credentials. He was made aware of the facility's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make any claims. He was provided with a copy of Section 3007 of RCRA and U.S. Federal Code 1001 and 1002, concerning false statements and documents, to read.

I discussed with Mr. Moran the facility operations, wastes generated and waste management practices. I conducted a visual inspection of UPI-KCMO accompanied by Mr. Moran and Mr. Tordoff. I reviewed various records including facility layouts and shipping documents. Information collected during the inspection is documented on the Entry/Exit Checklist and the Missouri Department of Natural Resources (MDNR) Used Oil Generator, Used Oil Collection Center, and Universal Waste Small Quantity Handler inspection checklists (see attachments 3A through 3D). I completed documents and collected photocopies that are included as attachments 1 through 14. Also, I collected photographs with a digital camera. They are included as photos 1 through 51 and are listed in the attached photo log.

At the conclusion of the inspection, I summarized the findings and recommendations with Mr. Moran. I provided Mr. Moran with a Confidentiality Notice, a Receipt for Documents and a Notice of Violation (NOV) which he signed as acknowledgment of receipt (see attachments 4 through 6). The compliance assistance documents provided during the inspection are listed on the Entry/Exit Checklist included as attachment 3A, page 2. I informed Mr. Moran of the MDNR hazardous waste website that contains hazardous waste technical guidance documents and other helpful RCRA information.

4.0 Findings and Observations

4.1. General Information

There are two UPI vehicle salvage yards located in the Kansas City area. They consist of this UPI-KCMO facility and another located at 1142 S. 12th St, Kansas City, KS (UPI-KCK). The UPI-KCK facility was started first around 2004, and then the UPI-KCMO facility was started around 2005. UPI also has a local corporate office located at 117 W. 20th St., Kansas City, MO. Mr. Moran stated that the local corporate office is only an office where both salvage yards send their paper work for handling.

UPI is associated with U-Pull-It, although Mr. Moran did not know exactly how legally. He stated that both are owned by Harry Henson and that U-Pull-It handles UPI's accounts payable. U-Pull-It has a corporate office located at 5705 S. 60th St., Suite 105 in Omaha, NE. Mr. Moran was not sure how long U-Pull-It has been in business, but stated that it has been a long time. There are several other related salvage yard companies owned by Mr. Henson located across the country. They include two in Omaha, NE, one in Lincoln, NE, and one in Prescott, AZ. Attachments 7A and 7B includes some company information obtained from both companies' websites located at www.upickitkc.com and www.upullitomaha.com.

The UPI-CMO site is about 13 acres which Mr. Hansen also owns (i.e., they do not lease the property). The site has one large building that contains a first floor and partial second floor (see attachments 8A and 8B for facility layouts and aerial photos). Mr. Moran stated that they do not have or use any facilities/buildings other than those mentioned above.

UPI-KCMO has about 20 full-time employees. During the summer, the facility is operated from 8:00A.M. to 7:00P.M., seven days a week. During the winter, it is operated from 8:00AM to dark, seven days a week. Vehicle processing takes place on only Monday through Friday. Mr. Moran stated that UPI-KCMO does not have an environmental person on-site. He stated that U-Pull-It has one environmental manager, Bill Baber, located at the U-Pull-It corporate office in Omaha, NE. Mr. Moran stated that Mr. Baber assists UPI-KCMO with compliance, visits the site about two to four times per month, and talks with him about two times a week.

4.2. Facility Operations

UPI-KCMO is a vehicle (autos and trucks) salvage yard. Mr. Moran stated that UPI-KCMO processes about 150 vehicles and one diesel vehicle per month. He stated that they process all vehicle types of various ages. He stated that the oldest he has seen is 1955 and the latest is 2011. Mr. Moran explained the vehicle process as follows (see attachment 8A for locations referenced on facility layout):

1. Buy scrap vehicles with legitimate titles from various individuals, tow companies, dealers, etc. The vehicle's information is entered into a computer program to determine the price UPI-KCMO is willing to pay for them.
2. Pick-up, or the seller drops off, the scrap vehicles.
3. Dispatch weighs the vehicles, assigns bar codes, and enters the vehicles' specifications (specs) into a computer database. The database tracks the make, model, year, date received, who purchased from, date processed, etc.
4. Place the vehicles in the Holding Area.
5. Move the vehicles to the Rack Area where fluids are removed. The fluids are removed by placing the vehicles on an overhead rack (see photos 40 and 46) and draining them. The fluids removed are the diesel (punch hole to drain), anti-freeze (cut bottom hose to drain or use a wand pump), oil (remove plug to drain), transmission fluid (punch hole in bottom of oil pan to drain) and gasoline (punch hole to drain).
6. Move the vehicles to the Pop Hood Area where additional fluids are pumped out including power steering, brake, and windshield wiper. Also, tire lug nuts are loosened, and trash, batteries and mercury switches are removed. Mr. Moran stated that UPI-KCMO does not remove fuel filters, used oil filters, headlights, brake pad/shoes and air bags.
7. Store the vehicles in their designated yard area (GM, Ford, Chrysler and Imports).
8. Customers shop throughout the yard areas, remove desired vehicle parts, and take them to the Sales Office for purchase.
9. Pull and replace the vehicles in the yard areas daily, Monday through Friday. Mr. Moran stated that on average, about 30 vehicles are pulled and replaced per day. He stated that they pull the oldest first, and on average the vehicles remain in the yard areas about 60 to 90 days.

10. Take the pulled vehicles to the Break Down Area where all remaining valuable parts/pieces are removed. This includes non-ferrous parts/pieces such as aluminum wheels, drums, copper, etc.
11. Move the vehicles to the Crusher Area where engines and transmissions are removed, copper wires are removed from the motors, and the vehicles are crushed flat in a crusher.
12. Load crushed vehicles onto semi-trailers and transport them to a shredder for metal recycling.

UPI-KCMO also has a Core Return Area where customers receive credit for parts including, aluminum and steel rims, tires, etc.

General maintenance (including oil changes) on company vehicles is conducted on-site. This maintenance is done in the Rack Area usually on Saturdays when no vehicle processing is occurring. All significant vehicle maintenance is conducted off-site at UPI-KCK by the same mechanic that conducts the general maintenance at UPI-KCMO.

4.3. RCRA Status

At the time of the inspection, I determined that UPI-KCMO was a non-generator of known hazardous waste, used oil generator, used oil collection center, and a small quantity handler of universal waste. However, additional hazardous waste determinations need to be made, as discussed below, that may affect the non-generator status determination. The checklists completed during the inspection are included as attachments 3A through 3D. According to the EPA RCRAInfo database, UPI-KCMO had not notified as a hazardous waste generator. I provided Mr. Moran an EPA RCRAInfo Handler Information Report which was completed (see attachment 9).

It should be noted that UPI-KCMO is located on property previously owned by AK Steel, Kansas City, MO. AK Steel had a RCRA permit and solid waste management units (SWMU) were identified on the UPI-KCMO's site. AK Steel is currently going through corrective action.

4.3. Wastes Streams

The following table lists the waste streams discussed.

#	WASTE NAME	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
	<p>Used Oil</p> <p>Used oil is generated from the following:</p> <ol style="list-style-type: none"> 1. Draining and pumping used oil and other fluids (transmission fluid, rear end fluid, and brake fluid) from scrap vehicles. 2. Conducting general maintenance on company vehicles and equipment. UPI-KCMO has four tow trucks, three semi-trailers, four trailers and various forklifts, skids loaders, and front end loaders. 3. Customers bringing used oil on-site as discussed below. 	<p>The used oil is managed as used oil.</p>	<p>The used oil is generated as follows:</p> <ol style="list-style-type: none"> 1. <u>Scrap Vehicles</u> - The scrap vehicle used oil is generated on average about 300 gallons per week according to Mr. Moran. The amount last shipped was 500 gallons on 2/3/2012 (see attachment 10). On 2/9/2012 during the inspection, a load was being collected for shipment. 2. <u>On-site Maintenance</u> - The general maintenance used oil is included in the above scrap vehicles' used oil generation rate. 3. <u>Customers</u> - Mr. Moran estimated that approximately one 275-gallon tote is filled per year. 	<p>The used oil is handled as follows:</p> <ol style="list-style-type: none"> 1. <u>Scrap Vehicles</u> - There is a sump in the Rack Area located under the two overhead racks where the used oil is drained from the scrap vehicles. The used oil is pumped from the sump into a 500-gallon above ground storage tank (see attachment 8A and photos 9 and 11). I observed about an inch of used oil in the storage tank containment that Mr. Moran stated will be pumped out when the used oil is collected for shipment. The other vehicle fluids are drained or pumped from the scrap vehicles into a container. The container is emptied into the above sump. 2. <u>On-site Maintenance</u> - The used oil from maintenance is collected in a container. The container is emptied into the above sump. 3. <u>Customers</u> - Customers bring containers of used oil on-site. The containers are emptied into a 275-gallon tote located in the Core Return Area (see photo 45). The used oil in the tote is emptied into the above sump. 	<p>The used oil is pumped from the storage tank by Heritage-Crystal Clean, Kansas City, KS (see attachment 10 for latest shipping document). Mr. Moran was not sure how Heritage-Crystal Clean handled the used oil. About a year ago, the used oil was collected by RS Used Oil, Kansas City, KS.</p>

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
		<p>Additional Information – Mr. Moran believed that the used oil is fuel blended, but was not sure how Heritage-Crystal Clean handled their used oil. I asked for this information to verify that the used oil was not being sent directly to a burner, and therefore making UPI-KCMO a used oil marketer (see attachment 5).</p> <p>Hazardous Waste Determination (NOV #3A) - According to 10 CSR 25-5.262(1)–40 CFR 262.11, a hazardous waste determination is to be made on all solid waste. On the northeast side of the Pop Hood Area, I observed five drums being stored (see attachment 8A for layout and photos 13 through 17). Mr. Moran estimated that the total volume between all five (three approximately full and two partially full) would equal about four full 55-gallon drums. All five drums were open with no labels as shown in photos 13 through 17. Mr. Moran initially believed that the drums contained some diesel fuel that was contaminated in some unknown way. However, he stated that after checking with other employees, the five drums contained waste cleaned out of the Rack Area sump about six to eight months ago. He stated that they needed to do a hazardous waste determination on this waste and decide how to dispose of it. It should be noted that I observed a spill around these five drums as shown in photo 16.</p> <p>Used Oil Collection Center (NOV #2) – According to 10 CSR 25-11.279(2)(D)2, used oil collection centers must notify the department of its used oil collection activities. Mr. Moran stated that UPI-KCMO had not registered or received any license as a used oil collection center. He stated that customers bring containers of used oil on-site and adds it into a tote located in the Core Return Area (see photo 45). He stated that UPI-KCMO does not solicit the used oil from the customers, but the customer just brings it on-site and leaves it. Mr. Moran stated that prior to six months ago, the customers were leaving the containers of used oil in the parking lot. Therefore, his employees would have to collect these containers from the parking lot. Mr. Moran stated that therefore, to keep the used oil from becoming a problem in the parking lot, and because they cannot always catch the customer and make them remove the used oil, they told the customers to dump the used oil containers into the tote located in the Core Return Area. Mr. Moran did not think UPI-KCMO was a collection center because they were not asking any customers to bring their used oil on-site. I asked Mr. Moran if the customers generated the used oil on-site while working on their personal vehicles. He stated that they do not allow customers to work on their vehicles on-site. Since it appears that UPI-KCMO was collecting household do-it-yourselfers used oil, I inspected them as a collection center. I also, informed Mr. Moran that I would verify with the state if UPI-KCMO was a collection center that needed to notify. I contacted Tom Judge, MDNR, on 2/15/2012 and he stated that UPI-KCMO would be considered a collection center and needed to notify the department.</p> <p>Used Oil Tote – The used oil tote appeared to have had a used oil label that had been partially covered by an empty sticker. Mr. Moran stated that the empty label was added when the tote was sent to UPI-KCMO for use. The tote was relabeled as used oil at the time of the inspection as shown in photo 45.</p>				
	Waste Anti-freeze/Windshield Wiper Fluid	Waste anti-freeze consists of anti-freeze and windshield wiper fluid drained from the scrap vehicles. Mr. Moran stated that they do not remove any solids from the anti-freeze. He stated that that they also have not had to clean out the waste anti-freeze storage tank.	The waste anti-freeze was determined to be non-hazardous based on knowledge (see discussion below).	The waste anti-freeze is generated at about 1000 gallons every two months. Based on shipping documents, UPI-KCMO last shipped 825 gallons on 1/4/12, 750 gallons on 9/13/2011 and 175 gallons on 7/28/2011 (see attachment 11B for shipping documents).	The waste anti-freeze is collected in 55-gallon drums that are emptied at the time of generation into a 1000-gallon above ground storage tank (see photos 9 and 11). I observed about an inch of waste antifreeze in the tank containment that Mr. Moran stated will be collected when the waste anti-freeze is shipped.	The waste anti-freeze is pumped from the storage tank by Hi-Tech Antifreeze Recycling, Eudora, KS for recycling (see attachments 11A and 11B for company information and shipping documents).

WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
<p>Hazardous Waste Determination / Additional Information - According to 10 CSR 25-5.262(1)→40 CFR 262.11, a hazardous waste determination is to be made on all solid waste. According to the <i>Anti-freeze</i> sheet included in the MDNR <i>Preventing Pollution During Vehicle Salvage</i> guide, used anti freeze from the late model vehicles, after 1995, is not RCRA hazardous (see attachment 11C). As stated above, UPI-KCMO receives all types of vehicles. Mr. Moran stated that he believes UPI-KCMO processes mostly late model vehicles. As discussed above in Section 4.2, UPI-KCMO tracks the year of all vehicles processed. I asked for verification regarding the amount of late vehicles processed for the last three anti-freeze shipments shown in attachment 11B (see attachment 5).</p>					
Waste Gasoline	Waste gasoline is drained from the scrap vehicles.	The waste gasoline is used as is on-site as a fuel and is therefore, not a RCRA solid waste. However, see discussion below for waste accumulated in tank containment.	The waste gasoline generation rate varies significantly according to Mr. Moran, but he estimated on average about 500 gallons per week.	The waste gasoline is drained into a 55-gallon drum and at the time of generation is pumped into a 500-gallon above ground storage tank (see photos 9 and 11). It is dispensed on-site into company vehicles for use. Also, see discussion below for waste accumulated in tank containment.	The waste gasoline is not shipped off-site. However, see discussion below for waste accumulated in tank containment.
<p>Additional Information Cleaning of Tank - Mr. Moran stated that the fuel tank was cleaned once in their five years of operation. However, he did not recall when, by whom, or what they did with any fuel/waste removed. I asked for this additional information (see attachment 5).</p>					
<p>Waste Fuel in Tank Containment / Possible Hazardous Waste Determination - I observed about an inch of waste gasoline in the storage tank containment, along with spent gasoline filters (see photos 8 and 10 and waste stream #4). Mr. Moran stated that the waste gasoline will either be pumped out by Heritage-Crystal Clean when they collect the used oil, or it will be cleaned out when they have the fuel storage tank cleaned again. I provided Mr. Moran with the MDNR <i>Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems</i> fact sheet (see attachment 12). After the inspection and further review of the fact sheet, it states that the Missouri Department of Agriculture 2 CSR 90-30 citation states that "Water or product shall not be allowed to accumulate within any secondary containment facility, this includes dikes and remote impoundments. Accumulated water and/or product within a secondary containment facility shall be removed and disposed of in a manner that is in compliance with applicable rules of the Department of Natural Resources." Based on this fact sheet information, how the waste fuel in the containment will be disposed may be a solid waste, and therefore, a hazardous waste. It should be noted that according to 10 CSR 25-11.279(B) → 40 CFR 279.10(d), mixtures of used oil and fuels are subject to used oil regulations.</p>					
Waste Gasoline Filters	Waste gasoline filters are generated from the fuel pipe line leading into the waste fuel storage tank (see waste stream #3 and photos 8 through 10). According to Mr. Moran, the fuel filters on the scrap vehicles are not removed. Therefore, they are crushed with the scrap vehicles that are sent for recycling (see waste stream #9).	Drained waste gasoline filters that are reclaimed as scrap metal are RCRA exempt. However, a determination had not been made on the undrained waste gasoline filters (see discussion below).	Mr. Moran estimated about one waste gasoline filter is generated every two weeks. I observed six spent filters inside the tank containment and two outside the containment that Mr. Moran stated were generated in the past one and half to two months (see photos 8 and 10).	The waste gasoline filters are collected with the general trash which is sent with the crushed vehicles to a metal recycler (see waste stream #16).	The waste gasoline filters are collected with the general trash which is sent with the crushed vehicles to a metal recycler (see waste stream #16).

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
Hazardous Waste Determinations (NOV #3D) - According to 10 CSR 25-5.262(1)-40 CFR 262.11, a hazardous waste determination is to be made on all solid waste. I observed six spent filters inside the tank containment and two outside the containment that Mr. Moran stated were generated in the past one and a half to two months (see photos 8 and 10). The six inside the containment sat in about an inch of waste fuel. The MDNR <i>Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems</i> fact sheet states the following concerning waste metal gasoline dispenser filters: (1) they can be managed as scrap metal if they are drained of all liquids and are sent for metal recycling; (2) they must be drained, dried, and stored in a closed container prior to being sent for recycling; (3) they should never be placed or drained in containment sumps as it violates Department of Agriculture regulations; (4) storing spent filters in a sump containment is a fire hazard; and (5) if they are not recycled, then they should be considered hazardous waste since they are likely to be characteristically hazardous for benzene (see attachment 12). Since the spent filters I observed being stored for the past one and half to two months were not drained, I determined them to be a solid waste for which a hazardous waste determination had not been made.						
	Used Oil Filters	Used oil filters are generated from maintenance on the company vehicles and equipment. According to Mr. Moran, the used oil filters on the scrap vehicles are not removed. Therefore, they are crushed with the scrap vehicles that are sent for recycling (see waste stream #9).	The used oil filters being reclaimed as a scrap metal are RCRA exempt.	Mr. Moran estimated at most about five used oil filters are generated per month.	The used oil filters are drained and collected with the general trash which is sent with the crushed vehicles to a metal recycler (see waste stream #16).	The used oil filters are collected with the general trash which is sent with the crushed vehicles to a metal recycler (see waste stream #16).
	Waste Diesel	Waste diesel is drained from the scrap vehicles (about one diesel vehicle is processed per month).	The waste diesel is used as is on-site as a fuel and is therefore, not a RCRA solid waste.	The waste diesel generation rate varies significantly according to Mr. Moran, but he estimated about 20 gallons per month.	The waste gasoline is drained into a container and at the time of generation is pumped into a 500-gallon above ground storage tank (see photos 9 and 11). It is used on-site in company equipment (forklifts, skids loaders and front end loaders).	The waste diesel is not shipped off-site.
	Waste Refrigerant	Waste refrigerant is drained from the scrap vehicles.	The waste refrigerant being reclaimed is RCRA exempt.	The waste refrigerant generation rate varies according to Mr. Moran. It was last reclaimed on 10/12/2011 (see attachment 13 for the latest invoice).	The waste refrigerant is collected in cylinders by UPI-KCMO.	The waste refrigerant is collected by Rapid Recovery, Phoenix, Arizona, for recycling (see attachment 13 for latest invoice).

Mixed Refrigerants - According to 10 CSR 25-4.261-40 CFR 261.4(b)(12), used chlorofluorocarbon (CFC) refrigerants being reclaimed are exempt. After the inspection and further review of the Rapid Recovery invoice, Rapid Recovery collected mixed refrigerants from two cylinders (see attachment 13). How Rapid Recovery handled the mixed refrigerant (i.e., was it reclaimed or disposed) was not discussed during the inspection.

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
	Waste Lead-Acid Batteries	Waste lead-acid batteries are removed from the scrap vehicles. Mr. Moran stated that they do not generate any other types of batteries.	The waste lead-acid core batteries are handled per 10 CSR 25-7.266 → 40 CFR Part 266, Subpart G.	The waste lead-acid batteries generation rate varies according to Mr. Moran, which he estimated on average to be about 120 batteries per week. Three pallets of batteries were last shipped off-site around February 2012 (see attachment 14).	The waste lead-acid batteries are either collected in the Sales Office to be sold or are accumulated on a pallet in the Pop Hood Area to be reclaimed.	The waste batteries are collected by Exide Technologies for recycling (see attachment 14 for latest shipping document).
	Scrap Metal	Scrap metal is segregated into ferrous and non-ferrous. The ferrous scrap includes the crushed scrap vehicles. The non-ferrous scrap includes copper, aluminum (Al radiators) and catalytic converters. Motors and transmissions may be either ferrous or non-ferrous depending on type. This waste stream also includes any scrap vehicle crushed pieces (glass, plastic) that are periodically scooped off the floor and put in a crushed vehicle.	The scrap metal is managed as scrap metal being recycled.	Mr. Moran stated that the scrap metal generation rate varies, but estimated they ship about 13 semi-tractor trailers (about 80,000 pounds gross weight each) per week.	The scrap metal is collected in containers.	The scrap metal is taken daily by UPI-KCMO to various scrap metal shredders for recycling. They include Midwest Metal Scrap located next door, Advantage Metal Recycling, Kansas City, MO and Alters Metal Recycling, Omaha, NE.
2	Spent Lamps	Spent lamps are generated when the building's spent lamps are changed. The types used on-site include 4ft fluorescent lamps and other unknown types in the process areas. Mr. Moran stated that they have an electrician, Redford Electric, Kansas City, MO, that changes the spent lamps (type unknown) located in the Dispatch Office. Lamps from scrap vehicles are not removed.	A hazardous waste determination had not been made on the spent lamps.	Mr. Moran did not know the generation rate of all the spent lamps. However, he stated that he has accumulated the 11 spent 4ft lamps currently in storage during his three years at the facility (see photos 6 and 7). Mr. Moran stated that the other unknown spent lamps in the process areas have not been changed, and that he did not know the generation rate for the Dispatch Office spent lamps.	The spent 4ft lamps are being accumulated in the Telephone System Room (see attachment 8A and photos 6 and 7). Mr. Moran stated that the other unknown spent lamps in the process areas have not been changed. He stated that Redford Electric removes and takes the Dispatch Office spent lamps.	The spent 4ft lamps have not been shipped off-site and the other unknown spent lamps in the process areas have not been changed according to Mr. Moran. He stated that Redford Electric takes the spent Dispatch Office spent lamps, but he is not sure what is done with them.

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
		<p>Hazardous Waste Determinations (NOV #3C) - According to 10 CSR 25-5.262(1)-40 CFR 262.11, a hazardous waste determination is to be made on all solid waste. I observed 11 spent 4ft lamps (not any low-mercury content green-tips) in storage at the time of the inspection. They were being stored in an open, unlabeled and undated box as shown in photos 6 and 7. Mr. Moran did not know exactly how long they have been stored other than they were generated during his three years at UPI-KCMO. I, a hazardous waste determination had not been made on the spent lamps. I discussed with Mr. Moran the choice of handling the spent lamps as hazardous waste or universal waste if they are determined to be hazardous. He stated that he did not know if they wanted to handle them as hazardous or universal waste.</p> <p>Co-generator of Spent Lamps - Mr. Moran stated that he did not know how the spent lamps taken by the electrician were being handled. I informed Mr. Moran that as a co-generator with the electrician, he should ensure that a hazardous waste determination has been made on the Dispatch Office spent lamps and that they are being handled properly.</p>				
1	Floor Sweepings / Contaminated Floor Dry	Mr. Moran stated that they put floor dry on the floor to collect all vehicle fluid spills in the process areas. He stated that they sweep the process areas that have floor dry separate from the areas that do not. The floor dry may be contaminated with any type of vehicle fluid depending on what spills/leaks (see photos 9, 11, 16, 38, 39, 40, 45, 46 and 47). Mr. Moran stated that the floor sweepings generated when sweeping the areas without floor dry would contain only dirt. He stated that the floor sweepings would not have any free liquids and that they do not sweep any areas outside.	The floor sweepings without floor dry are determined to be non-hazardous based on knowledge. Mr. Moran stated that he has not generated any contaminated floor dry to date.	The generation rate of the floor sweepings without floor dry varies. Mr. Moran stated that they have not generated any contaminated floor dry since he has been on-site.	The floor sweepings without floor dry are collected with the general trash (see waste stream #16). The contaminated floor dry has not been generated to date as discussed below.	The floor sweepings without floor dry are collected with the general trash (see waste stream #16). Mr. Moran stated that he has not shipped any contaminated floor dry off-site in his three years and he is not sure what was done with it prior to his time.
		<p>Last Management of the Contaminated Floor Dry - At the time of the inspection, I observed contaminated floor dry in various process areas on-site including the Tank Storage Area, Core Return Area, Rack Area and Crusher Area (see photos 9, 11, 16, 38, 39, 40, 45, 46 and 47). I observed significant amounts on the floor in the Rack Area and Crusher Area where the pulled motors are stored (see photos 38, 39 and 46). However, as stated above, Mr. Moran stated that any contaminated floor dry would not contain any free liquids when generated. Mr. Moran stated that he has not generated any contaminated floor dry since being the General Manager for the past three years. However, Mr. Moran stated that he knows the previous General Manager generated some contaminated floor dry because he worked with the "EPA." Mr. Moran stated that he did not know all the details including the amount removed, how it was disposed, and where it was exactly removed from other than it was from both inside and outside.</p> <p>Hazardous Waste Determination Discussion - When any contaminated floor dry is generated, a hazardous waste/used oil determination will need to be made. I provided Mr. Moran with various MDNR hazardous waste and used oil related technical bulletins including <i>Does Your Business Generate Hazardous Waste, Used Oil Generators, Used Oil Contaminated Waste, Used Oil Cleanup Packet - Contaminated Soil and Debris, and Used Oil Cleanup Checklist</i>.</p>				

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
2	Spills / Drains	Mr. Moran stated that they have four drains. They were located as follows: outside the Sales Office, in the sealed Electrical Room, in the Ford storage yard, and on the west side of the entrance (see attachment 8A). I also observed a drain at the northeast door that Mr. Moran stated was filled in with concrete to seal it off (see attachment 8A).	Mr. Moran was not sure where the drains discharged (see discussion below).	The amount of waste discharged through the drains was unknown.	Mr. Moran was not sure where the drains discharged.	Mr. Moran was not sure where the drains discharged.

Oil Spills (NOV #1) - According to 10 CSR 25-11.279(2)(B)4.B, used oil must not be disposed of into the environment. According to 10 CSR 25-11.279(2)(C) -40 CFR 79.22(d), upon detection of a release of used oil to the environment, the release must be stopped, contained and cleaned up. As discussed in Section 4.2, scrap vehicles are stored in the yard areas for customers to removed parts. On average about 30 scrap vehicles are pulled and replaced in the yard areas daily and vehicles remain in the yard areas about 60 to 90 days. I observed numerous apparent oil spills in the yard, including into the drains in the Ford storage yard and on the west side of the entrance (see attachment 8A and photos 18 through 37 and 48 through 50). Mr. Moran showed me a sample filter pad that they purchased and plan to install inside all the drains to catch any debris, residual fluids that may make it to the drains. According to Mr. Moran, part of the yard consists of concrete pads from old demolished building foundations, and part consists of gravel (see attachment 8B for soil and concrete areas as noted by Mr. Moran). The concrete pads were not contained and oil spills appeared to drain off onto the ground as shown in the above photos. Mr. Moran stated that he believed the outside area on the north side was all concrete pad, but in the past, millings were placed on top to fill in pad holes (see photos 30 through 33). I asked Mr. Moran when was the last time they cleaned any spills/leaks from the yard. He stated that he has not during his three years, but he believed the previous General Manager did once as explained in waste stream #11. He stated that the previous General Manager would have only removed the top soil and put it in a 55-gallon drum, but he did not know any other information as stated in waste stream #11.

Spills and Drain Discharges / Additional Information - As stated above, I observed apparent oil spills being drained into the drain in the Ford storage yard (see photos 40 through 24) and the drain on the west side of the entrance near the motor hoist (see photos 48 through 50). Mr. Moran was not sure where the drains exactly discharged. I asked if they had a storm water permit or if they were on combined sewers. He was not sure. During the inspection, Mr. Moran stated that he was contacting their corporate office to find out if they had a permit. However, he did not receive this information prior to my completing the inspection. I asked for this information to be provided and he agreed (see attachment 5).

3	Spent Rags / Towel Rolls	Mr. Moran stated that the Mechanic uses cloth rags to wipe grease/oil from his hands. He stated that other employees use cloth roll towels to dry their hands after washing them from general use on-site.	The spent rags/towel rolls are laundered and are therefore RCRA exempt.	The spent rags/towel rolls are generated at about 25 rolls/rags per month.	The spent rags/towel rolls are collected in containers.	The spent rags/towel rolls are collected by Cintas, Kansas City, MO for laundry.
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#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Waste Mercury Switches	Waste mercury switches are removed from the scrap vehicles. This includes from the hoods, trunks, etc. They are collected in a plastic tub in the Yard Office (see photos 1 and 2). Mr. Moran stated that when they have time, they remove the mercury ampoules and collect them in a 1-gallon plastic tub in the Yard Office (see photos 3 through 5 and 51).	<p><u>Mercury Switches with the Ampoules</u> - A hazardous waste determination had not been made on the waste mercury switches with the ampoules.</p> <p><u>Ampoules Removed</u> - A hazardous waste determination had not been made on the ampoules removed.</p> <p><u>Scrap Switches After Removing the Ampoules</u> - The scrap switches after removing the ampoules being reclaimed as a scrap metal are RCRA exempt.</p>	<p><u>Mercury Switches with the Ampoules</u> - Mr. Moran stated that the generation rate of the mercury switches with the ampoules varies. He stated that the approximately three-fourths full 10-gallon tub currently in storage was generated during his three years as General Manager (see photo 1).</p> <p><u>Ampoules Removed</u> - Mr. Moran stated that they have only shipped one full 1-gallon tub of mercury ampoules off-site about one and half years ago. At the time of the inspection, I observed one 1-gallon tub that contained a small amount of ampoules (see photo 4). Mr. Moran stated that this tub would have been started after the above tub was shipped. He stated that they last generated some ampoules about six months ago.</p> <p><u>Scrap Switches After Removing the Ampoules</u> - The generation rate of the waste mercury switches after removing the ampoules is the same as those containing the ampoules above.</p>	<p><u>Mercury Switches with the Ampoules</u> - The waste mercury switches containing the ampoules are collected in a 10-gallon tub in the Yard Office (see photos 1 and 2).</p> <p><u>Ampoules Removed</u> - The ampoules removed are collected in a 1-gallon tub in the Yard Office (see photos 3 through 5).</p> <p><u>Scrap Switches After Removing the Ampoules</u> - Mr. Moran stated that the scrap switches left after removing the ampoules are collected with the scrap metal (see waste stream #9).</p>	<p><u>Mercury Switches with the Ampoules</u> - The waste mercury switches containing the ampoules are not shipped off-site.</p> <p><u>Ampoules Removed</u> - Mr. Moran was not sure where the mercury ampoules were sent off-site (see discussion below).</p> <p><u>Scrap Switches After Removing the Ampoules</u> - The scrap switches after removing the ampoules are collected with the scrap metal (see waste stream #9).</p>

WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
<p>Hazardous Waste Determinations (NOV #1E)/Additional Information – According to 10 CSR 25-5.262(1)→40 CFR 262.11, a hazardous waste determination is to be made on all solid waste. A hazardous waste determination had not been made on the waste mercury switches with the ampules and the ampules removed. Mr. Moran stated that under the government's Cash for Clunkers program, the "ELVS" program was started. He stated that this was a program where in order for a company to receive the clunkers, they had to send the waste mercury removed to a specific place. He stated that they shipped one 1-gallon tub to that specific place, however, he did not recall the name of the place. During the inspection, Mr. Moran could not locate any information on the ELVS program or where the ampules were sent. I asked for any additional information UPI-KCMO had on the program and where the mercury ampules were sent. He stated that he would look for it. I asked Mr. Moran if they had made a hazardous waste determination on the waste mercury switches and ampules and he stated "no." I also discussed with Mr. Moran the choice of handling the waste mercury switches and ampules as hazardous waste or universal waste if they are determined to be hazardous. He stated that he did not know if they wanted to handle them as hazardous or universal waste, and that he wanted to talk with his corporate office before deciding.</p> <p>I asked Mr. Moran how they removed the ampules from the switches. He stated that they are removed in the Yard Office which is located next to his office, and is also here the switches are stored (see attachment 8A and photo 51). Mr. Moran stated that they remove the ampules over the desk with no containment, no employees have been trained on handling mercury or mercury emergencies, they do not monitor the room for OSHA mercury exposure, and they do not package the ampules with packing material to prevent breakage (see photos 1 through 5 and 51). I discussed with Mr. Moran that as universal wastes, removing the ampules would require additional requirements be met per 10 CSR 25-16.273(2)(B) → 40 CFR 273.13(c)(2). They include removing the ampules over containment and in a well ventilated room that is monitored for OSHA mercury levels, training for an emergency, and packing the ampules with packing material to prevent breakage. Mr. Moran stated that they last moved ampules about six months ago, and it was done by an old manager that is no longer at UPI-KCMO. Also, I informed Mr. Moran that as universal waste, the containers of mercury switches with the ampules and the removed ampules would have to be specifically labeled, the length of storage documented, and not be stored over a year as required by 10 CSR 25-16.273 → 40 CFR 273.14(d) and 273.15(a) and (c). I observed the containers of waste mercury switches and mercury ampules not specifically labeled and not dated. Mr. Moran did not know how long the switches had been accumulated, but stated that it would have been within the approximately one and a half years since they last shipped the one container of ampules off-site. I completed a MDNR universal waste checklist which is included as attachment 3D.</p>					
Spent Personal Protective Equipment (PPE)	The type of PPE worn during processing includes hard hats, company provided jeans, shirts, safety vests, leather gloves, boots, glasses, and Kevlar sleeves. Mr. Moran stated that the shirts, pants and gloves become spent and would be contaminated with oil/grease.	<p>The shirts and pants are laundered and are therefore, RCRA exempt.</p> <p>The spent gloves are determined to be non-hazardous based on knowledge.</p>	<p>About 100 shirts and pants are generated per week.</p> <p>About 15 pairs of gloves are generated per year.</p>	<p>The shirts and pants are collected in containers.</p> <p>The spent gloves are collected in containers with the general trash (see waste stream #16).</p>	<p>The shirts and pants are collected by Cintas, Kansas City, MO for laundry.</p> <p>The spent gloves are disposed with the general trash (see waste stream #16).</p>
General Trash	Refuse, paper, etc. This includes trash from the offices and trash removed from scrap vehicles.	The general trash is determined to be non-hazardous based on knowledge (see discussion below).	Mr. Moran stated that they dump all their approximately 10, 10-gallon trash cans weekly.	The general trash is collected in containers in the offices and in a pile near the Pop Hood Area (see photo 47). It is then added to the crushed vehicles to be taken to the shredder.	The general trash is collected with the ferrous scrap metal (see waste stream #9).

WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
<p>Hazardous Waste Determination (NOV #3B) - According to 10 CSR 25-5.262(1)→40 CFR 262.11, a hazardous waste determination is to be made on all solid waste. A hazardous waste determination had not been made on the waste pulled from the scrap vehicles. Mr. Moran stated that all the trash removed from scrap vehicles is returned to the scrap vehicles after they have been crushed to be sent to the shredder. He stated that this would include the two waste piles I observed near the Pop Hood Area (see photos 40 and 47). Mr. Moran stated that they do not put large amounts of trash in the crushed vehicles because the shredders would not like most of the weight they received to be non-metal. He stated that if they receive a large load of trash from a vehicle, such as a truck full of leaves and wood, then they would collect the trash in a mini-trailer and haul it to the Deffenbaugh sanitary landfill. He stated that however, having to take the trash to Deffenbaugh happens on "very rare occasions." He stated that they last took a load of trash to the sanitary landfill about one year ago. All other trash is sent with the crushed vehicles to the scrap metal shredder (see waste stream 1). I discussed with Mr. Moran that a hazardous waste determination needs to be made on all waste trash, and that any hazardous waste trash should not be sent to a metal recycler. At the time of the inspection, I observed two full five gallon pails that Mr. Moran stated were removed from a scrap vehicle around the "beginning of last week" (i.e., around 1/30/2012). One of the pails was in poor condition and labeled used anti-freeze, and the other one was labeled as some type of finish as shown in photo 12. Mr. Moran stated that he did not know what to do with these two pails, and that they needed to do a hazardous waste determination on them.</p>					

Other waste streams discussed included the following:

- Waste tires are collected in a pile near the Break Down Area. They are loaded into a trailer owned by ABC Tires, Kansas City, MO. ABC Tires collects the waste tires for recycling into playground material. UPI-KCMO has an MDNR Tire Dealer permit.
- Mop water is not generated on-site and no painting is conducted on-site.

Polychlorinated Biphenyl (PCB) Transformers

UPI-KCMO is currently working with EPA on removing PCB containing transformers. At the request of Kent Johnson, EPA Counsel, I visually inspected the transformer area. Mr. Moran stated that there were two transformers on-site. He stated that Kansas City Power & Light (KCPL) had already removed one transformer and was in the process of removing the other that day, 2/10/2012. Mr. Moran stated that both transformers were located in the Electrical Room, and none had been stored outside. He stated that they did not have any PCB spills outside. Mr. Moran stated that the PCB spill an inspector observed was in a catch pan that had collected when a spigot on the transformer was opened. Mr. Moran stated that he inspects the pan and they have not had any leaks. Photos of the transformer area are shown in photos 41 through 44.

4.5. Other RCRA Issues

At the time of the inspection, I inspected the facility as a non-generator of known hazardous waste, used oil generator, used oil collection center and small quantity handler of universal waste. However, additional hazardous waste determinations need to be made that may affect the non-generator status determination. The other regulatory requirements that were reviewed are shown in attachments 3B through 3D, which consists of the compliance checklists. Other than the items noted above, no other apparent violations were noted in these areas. However, EPA may be reviewing my findings further after the inspection that may change or add to my findings.



Dedriel L. Newsome

Environmental Engineer

Date: 3/2/12

Attachments

1. Multi-media Screening Checklist (2 pages)
 2. Copy of Business Cards (1 page)
 3. Checklists
 - A. Entry / Exit Checklist (2 pages)
 - B. MDNR Used Oil Generator (2 pages)
 - C. Used Oil Collection Center (2 pages)
 - D. Universal Waste Small Quantity Handler (4 pages)
 4. Confidentiality Notice (1 page)
 5. Document of Receipt (1 page)
 6. NOV (1 page)
 7. Company Information
 - A. UPI-KCMO (1 page)
 - B. U-Pull-It (1 page)
 8. Facility Layouts
 - A. Facility Layout (2 pages)
 - B. Aerial Photo with Designated Dirt Areas (1 page)
 - C. Aerial Photo With Photo Locations (1 page)
 9. EPA RCRA Info Sheet (1 page)
 10. Used Oil Shipping Document (1 page)
 11. Anti-Freeze Information
 - A. Anti-Freeze Recycling Company Info (4 pages)
 - B. Anti-Freeze Shipping Document (3 pages)
 - C. Anti-freeze Sheet from the MDNR Preventing Pollution During Vehicle Salvage Guide (3 pages)
 12. MDNR Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems Fact Sheet (3 pages)
 13. Rapid Recovery Invoice (1 page)
 14. Spent Lead-Acid Batteries Shipping Document (2 pages)
- Photo Log (3 pages)
- Photographs (27 pages / 51 photos)

Forward To: ☐ E/I ☒ EPCRA/RMP/TSCA ☒ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA/CRA ☒ RCRA ☐ UST ☐ SPC ☐

REGIONAL MULTIMEDIA SCREENING CHECKLIST

Facility Name: V-Rick-It Inspector: Dedrick Newsome
Facility Ownership: Harry Hansey Primary Media: RCRA
Street: 7700 E. Winner Rd Inspector Phone Ext.: 7049
City: Kansas City State: MO Zip: 64125 Date: 2/9/12
Phone: 816-241-7548 Facility Contact: _____ SIC/NAICS Code: 28441310
Number of Employees: 220 Work Hours/Shifts: 8A-7P/7days/wk Facility Subject to OSHA regulations Yes ☐ No ☐
8A - 7day/week/weekend

Main facility activity, major process chemical(s) & description: Auto salvage yard

(Check all that apply): painting/coating (water-based ☐ solvent-based ☐), printing ☐ reacting ☐ formulating ☐ distilling ☐,
water treatment ☐ refrigeration ☐ manufacturing ☐ parts washers/degreasing (water-based ☐ halogenated-based ☐,
non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ other ☐).

ENVIRONMENTAL JUSTICE (Note: Forward to E/I if a concern is identified during your inspection)

1. Is the facility located in an adjacent low income area (e.g., with many abandoned and dilapidated properties)? No ☐ (stop) Yes ☐
If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ Forward to E/I

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with the department, Local & State Emergency Planning Committee? Yes ☐ No ☐ Forward to EPCRA
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ Forward to EPCRA
3. Has the facility: If any box in question 3 is marked - Forward to EPCRA
a. Stored ≥500 lbs of ammonia ☐ ≥100 lbs of chlorine ☐ or ≥10,000 lbs of an industrial chemical ☐ at any time over the last 2 years? ☐
b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
c. Used ≥10,000 lbs of ammonia ☐ chlorine ☐ halogenated solvents ☐ solvent-based paints ☐ or solvents ☐ or nitrated compound, over the last calendar year? ☐
d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☐ (stop) Yes ☒ Forward to TSCA and ask: Has facility tested oil filled equipment to determine PCB content? No ☐ Yes ☒ number containing PCBs greater than 50 ppm 2 and percent of oil 100% is equipment tested (including wet or weeping equipment)? No ☐ Yes ☐ - Get Photo 30441310 to Kansas City

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☐ (stop) Yes ☒
If yes, are all wastewater discharges permitted? Yes ☐ No ☐ Forward to CWA we have discharge
2. Does the facility have process wastewater that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
If yes, are the discharges permitted by: State? ☐ City? ☐ - If yes, Stop here. No ☐ Forward to CWA
If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ Forward to CWA
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☒
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ Forward to CWA we are not
4. Did you see any wastewater discharges not identified by the facility? No ☐ (stop) Yes ☐ - Identify location, time, appearance of discharge: All upriver (Get Photo) Forward to CWA
5. Does the facility have any wetland areas (e.g., streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? (Get Photo) FWD to Wetlands
No ☐ (stop) Yes ☐ - Identify location and timeframe _____

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspool, etc.)? Yes ☐ No ☒ (stop) Yes ☐ Forward to UIC
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ Forward to PWS
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ Forward to CAA
(Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
Source: _____
If yes, is equipment permitted? Yes ☐ No ☐ Forward to CAA Describe: _____

3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ Forward to CFC
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ Service Company: _____

4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ Forward to EPCRA/RMP
5. Does the facility service motor vehicle air conditioning systems? No ☐ (stop) Yes ☒ Forward to CEC (Obtain from car)
License of person driving from there.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☐
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ Forward to RCRA All report
2. Is hazardous waste treated ☐ stored >90-days ☐ burned ☐ land filled ☐ put in surface impoundments ☐ or waste piles ☐?
No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ Forward to RCRA All report
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐ All report

Material Claimed To Be Non-Hazardous

How does the facility know these wastes are non-hazardous?

Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/>	None available <input type="checkbox"/>	Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/>	None available <input type="checkbox"/>	Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/>	None available <input type="checkbox"/>	Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/>	None available <input type="checkbox"/>	Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/>	None available <input type="checkbox"/>	Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/>	None available <input type="checkbox"/>	Forward to RCRA

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☐ Yes ☐ Forward to RCRA
(Get Photo)

5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☐ Yes ☒ Forward to RCRA
(Get Photo)

6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☐ Yes ☐ Forward to RCRA &
(Get Photo)

7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☐ Yes ☐ Forward to UST
8. Does the facility have any underground fuel tanks for emergency generators? No ☐ Yes ☐ Forward to UST

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☒ (stop) Yes ☐ Does the facility have a certified SPCC Plan? Yes ☐ No ☐ Forward to SPCC
If yes, are there secondary containment systems for the tanks? Yes ☒ No ☐ Forward to SPCC
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☒ Yes ☐ (Get Photo) Forward to SPCC

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☐ Yes ☒
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

• PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS

Version 08.23.05a GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION



Adam Moran
General Manager

1142 South 12th St.
Kansas City, KS 66105
(913) 321-1000
huskierfun832@yahoo.com

7700 Winner Rd.
Kansas City, MO 64125
(816) 241-7548



Nick Tordoff

(913) 815-8260

1142 South 12th St.
Kansas City, KS 66105
813-321-1000

7700 Winner Rd.
Kansas City, MO 64125
816-241-7548

ATTACHMENT 2.docx [1]

Facility: M-Pick-It ATTACHMENT 13 - PUNCH LIST (abbreviated checklist) Date: 2/9/12 Arrival time: 2:45pm

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No *view possible*
2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way) N
3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

Facility Orientation

- Containers
- Tanks
- Processing Equipment
- Loading Areas
- Unloading Areas
- Security Devices
- Open Drains
- Stressed Vegetation
- Unusual Staining
- Unusual Odors
- Obvious Discharges
- Improper Disposal
- Safety Concerns
- Other Concerns



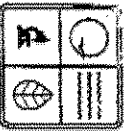
SITE ENTRY AND INSPECTION

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) ☒ No
2. Facility Representative(s): Adam Moran Title: Gen Mgr (3 yrs/2 yrs)
Nick Tordoff Title: Asst "R" (9 yrs/9 yrs)
3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No How long in position? _____
4. Introduction:
- ☒ Presented credentials
 - ☒ Verified presence at correct facility (checked address/D #)
 - ☐ Explained authority to conduct inspection (Section 3007 of RCRA)
 - ☒ Explained the purpose, scope, and order of the inspection
 - ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc.
 - ☒ Explained facility's right to claim CBI
 - ☐ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
 - ☒ Identified personal safety considerations
 - ☒ Completed Multimedia screening checklist 4-1-1
 - ☒ Provided SBREFA handout 2-1-1
 - ☐ Obtained GPS reading
5. Was full access granted? ☒ Yes ☒ By facility representative Other (name): _____
- ☐ No - Access denied Name of person denying access: _____ Time of denial: _____
- Reason for denial, or limitations placed on access: _____

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
 - Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information
 - Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/discharged, quantity
 - Identified/unresolved violations from previous inspection were corrected (if applicable)
 - Addressed all unresolved inspection related issues
 - Summarized findings and observations for the facility representatives
- NOV issued? ☒ Yes ☐ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officers will make the final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form
3. Specific information requested from facility? ☒ Yes ☐ No _____
4. Facility appears to have awareness of RCRA regulations and/or has its own environmental staff? ☐ Yes ☒ No personnel
5. Facility has copy of applicable regulations? ☒ Yes ☐ No



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
USED OIL GENERATOR
INSPECTION RECORD AND CHECKLIST

NAME	U-Pick-It		DATE	2/8-9/12	EPA ID NUMBER	None
ADDRESS	7700 E. Hwy 24					MO ID NUMBER
CITY	KL, MO	NUMBER OF EMPLOYEES	YEARS AT SITE	TELEPHONE NUMBER		
FACILITY REPRESENTATIVE(S), TITLE(S)						

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

See report

A. USED OIL STORAGE

1. <input checked="" type="checkbox"/> Used oil is managed properly and not disposed of into the environment or cause a public nuisance - 10 CSR 25-11.279(2)(B)4.B.	COMMENTS
2. <input type="checkbox"/> Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	see report and photo
3. <input type="checkbox"/> Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	" "
4. <input checked="" type="checkbox"/> Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	see report
5. <input checked="" type="checkbox"/> Fill pipes used to transfer oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2).	see report
6. <input type="checkbox"/> Containers/tanks which are exposed to rainfall are closed - 10 CSR 25-11.279(2)(C)6.	see report
7. <input checked="" type="checkbox"/> Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	see report
8. <input type="checkbox"/> Mixtures of used oil and hazardous waste are managed according to state hazardous waste regulations - 10 CSR 25-11.279(2)(B)2.	see report

B. ON-SITE BURNING

1. <input type="checkbox"/> Burn only their own used oil or used oil from DTY's or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	COMMENTS
2. <input type="checkbox"/> Burn only in space heaters with design capacity < 5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	
3. <input type="checkbox"/> Combustion gases from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c).	

C. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS

	COMMENTS
1. <input checked="" type="checkbox"/> Used oil is transported by transporters who have obtained EPA Identification numbers unless one of the following is met - 10 CSR 25-11.279(f) incorporating 40 CFR 279.24.	

40 CFR 279.24(a)	
------------------	--

2. <input type="checkbox"/> Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(f) incorporating 40 CFR 279.24(a)(1).	N/A
---	-----

3. <input type="checkbox"/> Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(f) incorporating 40 CFR 279.24(a)(2).	
---	--

4. <input type="checkbox"/> Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(f) incorporating 40 CFR 279.24(a)(3).	
---	--

OR 40 CFR 279.24(b)	
---------------------	--

5. <input type="checkbox"/> Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(f) incorporating 40 CFR 279.24(b)(3).	N/A
--	-----

OR 40 CFR 279.24(c)	
---------------------	--

6. <input type="checkbox"/> Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(f) incorporating 40 CFR 279.24(c).	N/A
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CHECKLIST KEY

Check the ☒ if in compliance.
Circle the ☐ if not in compliance and provide comment.
N/A = Not Applicable.

An item emphasized by a black line on the left is a serious deviation from the requirements (Class I Violation).

An unemphasized item is a significant deviation from the requirements (Class II Violation unless conditions warrant Class I).

COMMENTS

INSPECTOR'S SIGNATURE

Robbie Munroe

DATE

2/9-10/12



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
USED OIL COLLECTION CENTER
INSPECTION RECORD AND CHECKLIST

NAME	U-Pick-It		DATE	2/8-9/12	EPA ID NUMBER	None
ADDRESS	7700 E Hwy 24					MO ID NUMBER
CITY	KCMO	NUMBER OF EMPLOYEES	YEARS AT SITE		TELEPHONE NUMBER	
FACILITY REPRESENTATIVE(S), TITLE(S)						

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

See Report

A. GENERAL REQUIREMENTS

☐ Facility has notified the department of its used oil collection activities - 10 CSR 25-11.279(2)(D)2.

COMMENTS

☒ Attendant present when the public has access to the facility - 10 CSR 25-11.279(2)(D)5.B.

COMMENTS

B. USED OIL STORAGE

☒ No quantity of used oil stored for more than 12 months - 10 CSR 25-11.279(2)(D)3.

COMMENTS

☐ Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.22(c).

COMMENTS

☒ Has means of controlling public access to the used oil storage area - 10 CSR 25-11.279(2)(D)5.

COMMENTS

☒ Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.22(b)(1).

COMMENTS

☒ Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.22(b)(2).

COMMENTS

☒ Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.22(c)(1).

COMMENTS

7. ☒ Fill pipes used to transfer used oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.22(c)(2).
N/A

8. ☒ Containers/tanks exposed to rainfall are closed - 10 CSR 25-11.279(2)(D)4.

C. ON-SITE BURNING

1. ☐ Burn only their own used oil or used oil from DIVERS or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.23(a).
N/A

2. ☐ Burn only in space heater with design capacity < .5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.23(b).

3. ☐ Combustion gasses from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.23(c).

D. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS

☒ Used oil is transported by transporters that have obtained EPA identification numbers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.24.
N/A

(If no licensed transporter is used)

2. ☐ Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.24(a)(1).
N/A

3. ☐ Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.24(a)(2).

4. ☐ Transports the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.24(a)(3).
N/A

OR

5. ☐ Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.24(b)(3).
N/A

OR

6. ☐ Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(1) incorporating 40 CFR 279.31(b)(1) referencing 40 CFR 279.24(c).
N/A

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable.

A shaded item is a serious deviation from the requirements (Class I violation).

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I).

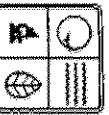
COMMENTS

INSPECTOR'S SIGNATURE

Robert Mousane

DATE

2/9-10/12



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
UNIVERSAL WASTE SMALL QUANTITY HANDLER CHECKLIST

U

A SMALL QUANTITY HANDLER OF UNIVERSAL WASTE DOES NOT ACCUMULATE 5,000 KG OR MORE TOTAL OF ALL TYPES OF UNIVERSAL WASTE AT ANY TIME.

NAME	U-Pick-It	DATE	2/9-10/12	EPA ID NUMBER	None	MO ID NUMBER	
ADDRESS	7700 E Hwy 24	CITY	KC, MO	COUNTY		TELEPHONE NUMBER WITH AREA CODE	
				ZIP CODE		RR NUMBER	
CONTACT NAME		CONTACT TITLE	Asst. Manager	YEARS AT SITE		DATE OF LAST INSPECTION	
				NUMBER OF EMPLOYEES			

M. GENERAL

COMMENTS

1. <input checked="" type="checkbox"/> MA <input type="checkbox"/> Does not dispose of universal waste - 10 CSR 25-16.273(1) incorporating 40 CFR 273.11(a).	1	
2. <input checked="" type="checkbox"/> Does not dilute or treat universal waste except as provided by 40 CFR 273.17 or 40 CFR 273.13 - 10 CSR 25-16.273(1) incorporating 40 CFR 273.11(b).	1	
3. <input checked="" type="checkbox"/> Does not accept universal waste pesticides from other handlers unless operating a universal waste pesticide collection program - 10 CSR 25-16.273(2)(B)1.	2	
4. <input type="checkbox"/> Universal waste accumulated for less than one year from the date generated or received from another handler - 10 CSR 25-16.273(1) incorporating 40 CFR 273.15(a).	2	see report
5. <input checked="" type="checkbox"/> Can demonstrate the length of time universal waste has been accumulated from the date it becomes a waste or is received (marking, labeling, inventory, dated area, or other valid method) - 10 CSR 25-16.273(1) incorporating 40 CFR 273.15(c).	2	see report
6. <input type="checkbox"/> Accumulates universal waste for only one year unless able to demonstrate activity is solely for the purpose of accumulating quantities to facilitate proper recovery, treatment or disposal - 10 CSR 25-16.273(1) incorporating 40 CFR 273.15(b).	2	see report

N. PREPAREDNESS AND EMERGENCY TRAINING

COMMENTS

1. <input type="checkbox"/> Immediately contains all releases of universal wastes and universal waste residues - 10 CSR 25-16.273(1) incorporating 40 CFR 273.17(a).	1	no release known
2. <input type="checkbox"/> Determines if materials from a universal waste release are hazardous waste and are properly managed - 10 CSR 25-16.273(1) incorporating 40 CFR 273.17(b).	1	" " " "
3. <input checked="" type="checkbox"/> Provides all employees who manage universal waste with information describing proper handling and emergency procedures appropriate for universal wastes handled at the facility - 10 CSR 25-16.273(1) incorporating 40 CFR 273.16.	2	

O. OFF-SITE SHIPMENTS

COMMENTS

1. <input type="checkbox"/> Non-pesticide universal wastes only sent to another universal waste handler, destination facility, Missouri resource recovery facility, or foreign destination - 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(a) as modified by 10 CSR 25-16.273(2)(B).	1	see report
2. <input checked="" type="checkbox"/> Complies with universal waste transporter requirements if self transporting universal waste - 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(b).	2	
3. <input type="checkbox"/> Uses proper shipping documents, packages, labels, marks and provides placards per DOT requirements on universal waste that meets hazardous materials definition - 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(c).	2	see report
4. <input type="checkbox"/> Ensures receiving handler agrees to accept universal waste prior to shipment - 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(d).	2	see report

O. OFF-SITE SHIPMENTS (CONTINUED)		COMMENTS
5. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Accepts rejected universal waste or agrees with receiving handler to ship to an alternate destination facility – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(e).	2 Not Reported
6. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Contacts originating handler to discuss reshipment of the load back to originating handler or to a mutually agreed on destination facility if handler rejects a shipment or portion of a shipment – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(f).	2 " "
7. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Originating handler receives back or sends rejected pesticides to another Missouri-certified resource recovery facility or destination facility if universal waste pesticides are rejected – 10 CSR 25-16.273(2)(B)4.	2 " "
8. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Immediately notifies the department if receive a shipment of hazardous waste and provides required information – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(g).	2 " "
9. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Manages waste in compliance with applicable solid waste regulations if receives a shipment of non-hazardous, non-universal wastes – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(h).	2 Not Reported
10. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Exported universal waste regulations met including notification, annual reporting, and record keeping – 10 CSR 25-16.273(1) incorporating 40 CFR 273.20 referencing 40 CFR 262 Subpart E or Subpart H.	2 Not Reported

P. BATTERIES		COMMENTS
1. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Batteries stored in a manner to prevent releases to the environment (box, shrink wrapped pallet, container, etc) – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a).	2 Not Reported
2. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Damaged or leaking batteries kept in closed, structurally sound containers – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a)(1).	1 Not Reported
3. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Individual battery cells kept intact and closed while performing approved management of batteries (sorting, discharging, disassembling battery packs, etc) – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a)(2).	2 Not Reported
4. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Cells immediately closed after the removal of electrolyte – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a)(2).	1 Not Reported
5. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	If casings of individual battery cells are breached then manages batteries as hazardous waste if characteristic – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.	1 Not Reported
6. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Determines if electrolyte removed from cells and other solid wastes generated exhibit hazardous waste characteristics and properly manages – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(3).	1 Not Reported
7. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Batteries or battery containers clearly labeled or marked as "Universal Waste-Batteries" or "Waste Battery(ies)" or "Used Battery(ies)" – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(a).	2 Not Reported

Q. PESTICIDES		COMMENTS
Only pesticides that have been recalled or are unused and gathered as a Missouri authorized waste pesticide collection program can be managed as universal wastes.		
1. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste pesticides stored in closed, structurally sound container that is compatible with the wastes and not leaking or damaged – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(b)(1).	1 N/A
2. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste pesticides stored in closed, structurally sound transport vehicles/vessels that are compatible with the wastes and not leaking or damaged – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(b)(4).	1 N/A
3. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste pesticide stored in tanks that conform with Part 265 Subpart J except for 40 CFR 265.197(c), 265.200, and 265.201 – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(3).	1 N/A

MO 780-2128 (01-11)

Q. PESTICIDES (CONTINUED)		COMMENTS
4. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Recalled universal waste pesticide container, tank, transport vehicle or vessel labeled or marked with the label that was on or accompanied the product as sold/distributed – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(b)(1).	2
5. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Unused universal waste pesticide container, tank, transport vehicle or vessel labeled or marked with the label that was on or accompanied the product as sold/distributed or the US DOT label as required by 49 CFR Part 172, or a label designated by the Missouri waste pesticide collection program – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(c)(1).	2
6. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste pesticides container, tank, transport vehicle or vessel marked or labeled clearly with product label and the words "Universal Waste Pesticide(s)" or "Waste Pesticide(s)" – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(b)(2) and (c)(2).	2
7. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste pesticides sent only to authorized destination facility or Missouri universal waste pesticide program – 10 CSR 25-16.273(2)(B).	1
8. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste pesticides not sent to or received from another universal waste handler – 10 CSR 25-16.273(2)(B).	1
R. MERCURY CONTAINING EQUIPMENT		
COMMENTS		
1. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Mercury containing equipment stored in a manner to prevent releases to the environment (box, container, etc.) – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c).	1
2. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Damaged or leaking mercury containing equipment or mercury containing equipment with non-contained elemental mercury kept in a closed, structurally sound container – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(1).	1
3. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Mercury ampules or open original housing holding mercury removed over or in a containment device – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(iii).	1
4. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Mercury clean-up system readily available – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(iii).	2
5. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Mercury from spills or leaks of broken ampules or open original housing holding mercury immediately transferred to container meeting 40 CFR 262.34 requirements – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(iv).	1
6. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Area where ampules or open original housing holding mercury are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels of mercury – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(iv) and 273.33(c)(2).	2
7. <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Employees removing ampules or open original housing holding mercury thoroughly familiar with proper mercury handling and emergency procedure – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(v).	2
8. <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Removed ampules or open original housing holding mercury stored in closed, non leaking containers that are in good condition and packaged with adequate packing material to prevent breakage during storage, handling, and transportation – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(vii).	1
9. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Open original housing holding mercury removed from mercury containing equipment immediately sealed with airtight seal – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(3)(i).	1

MAO 786-2129 (01-11)

R. MERCURY CONTAINING EQUIPMENT (CONTINUED)		COMMENTS
10. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Determines if wastes generated from mercury ampules or housing removal activities exhibits hazardous waste characteristics. If hazardous waste then manages as hazardous waste per 40 CFR part 262 - 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(4).	1 <i>or not</i>
11. <input checked="" type="checkbox"/> <input type="checkbox"/>	Universal waste mercury equipment or containers marked or labeled clearly: "Universal Waste-Mercury Containing Equipment" or "Waste Mercury Containing Equipment" or "Used Mercury Containing Equipment" - 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(d)(1).	2
12. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Universal waste mercury containing thermostats or containers marked or labeled as "Universal Waste-Mercury Thermostat(s)" "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" - 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(d)(2).	2
S. LAMPS		
1. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Broken or leaking lamps immediately cleanup and placed in closed, structurally sound, non-leaking containers and managed as hazardous waste - 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(2) and 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.	1
2. <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	Bulb crusher or other type of treatment not performed on lamps - Section 260.390.1(1) RSMo.	1
3. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Unbroken lamps stored in closed, non-leaking containers or packages that are structurally sound and adequate to prevent breakage - 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(1).	2
4. <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Each lamp or lamp container or package marked or labeled clearly as "Universal Waste Lamp(s)" or "Waste Lamp(s)" or "Used Lamps" - 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(e).	2

MO 386.2129 (05-11)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	U-Pick-It
Facility Address	7706 E. Winner Rd. Kansas City, MO
Inspector (print)	Dedric Newcome
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
<i>Heidi Johnson</i> <i>11-15-99</i>	
I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name	U-Pick-It
Facility Address	7710 E. W. W. Rd. KC MO

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☒

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Facilities Documents Appd
H-Tech Anti-Freeze Inf. (4 pg)
Crystal Clean 2/12/12 Ship Doc (1 pg)
Rapid Recover Ship Doc 10/12/11 (1 pg)
Battery Ship Doc (3 pgs)
Anti Freeze Ship Doc (3 pgs)

Additional Info:

- 1 For past 3 ship of Anti-Freeze Model Years
- 2 What Crystal Clean does with used oil
- 3 When cleaned out fuel tank and what did anti-freeze was done
- 4 What the shore drivers drive to
- 5 Do have storm water permit.

Facility Representative (print)	Signature/Date
Inspector (print)	Signature/Date
Dedric Newsome	J. Dedric Newsome 2/1/12
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(Rev: 1/20/93)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: M. Pick-J-I

Address: 7700 E. Lawrence Rd

EPA ID Number: Non-Motifier

Date: 2/8-9/12

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the inspection.

Citation As incorporated in state regulations	Description of Violation
1) 10 CSR 25-11.279(2)(B)4.B and 40 CFR 279.22(d)	Used oil being disposed in the environment and not being cleaned up
2) 10 CSR 25-11.279(2)(D)2	Not notified the department of used oil collection
3) 10 CSR 25-5.262(1) & 40 CFR 262.11	Made a hazardous waste determination on A) Submersible pumps B) 2 5 gal pails of unknown (4 each removed from cars) C) Spent lamps D) Gasline filters in container E) Mercury switches

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
901 N. 5th St
KC, KS 66101
ATTN: Ashley Newman

If you have any questions about this Notice or wish to discuss your response, you may call me at 913-551-7849 or Ruth Koster (Compliance Officer) at 913-551-7673.

This Notice prepared by A. Newman Date: 2/9/12

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: _____ Date: _____
Signature: _____
Title: _____



- Home
- Vehicles In Yard
- Directions
- Contact Us
- Sell Your Vehicle
- Price List
- Employment

[Click Here To See](#)

please check back frequently for updates and to see new listings of vehicles in our yard



We Buy Unwanted & Junk Cars

click here to sell your vehicle
816-241-7548

**U-pick-it - pick what you want
from our yard for the best
deal
on used auto parts!!!**

We are open now!!!

Hours of operation

Winter hours now in effect

8:00am till 5:00pm Mon-Fri

8:00am till 5:00pm Saturday

9:00am till 5:00pm Sunday





Always Buying Junk Cars and Scrap Metal

click here to sell your vehicle

402-734-6029

402-342-0831

U-pull-it - pull what you want

from our two yards for the best deal on used auto parts!!!

Hours of operation

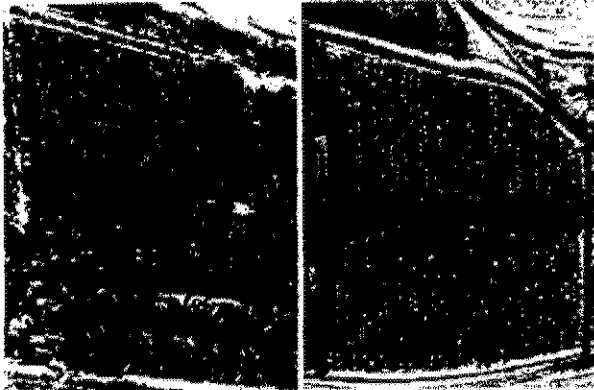
8:00am till 7:00pm Mon-Sunday

Winter Hours

We close at Dark


Home
Sell Your Vehicle
Locations
Contact Us

please check back frequently for updates to our site



North Yard

South Yard

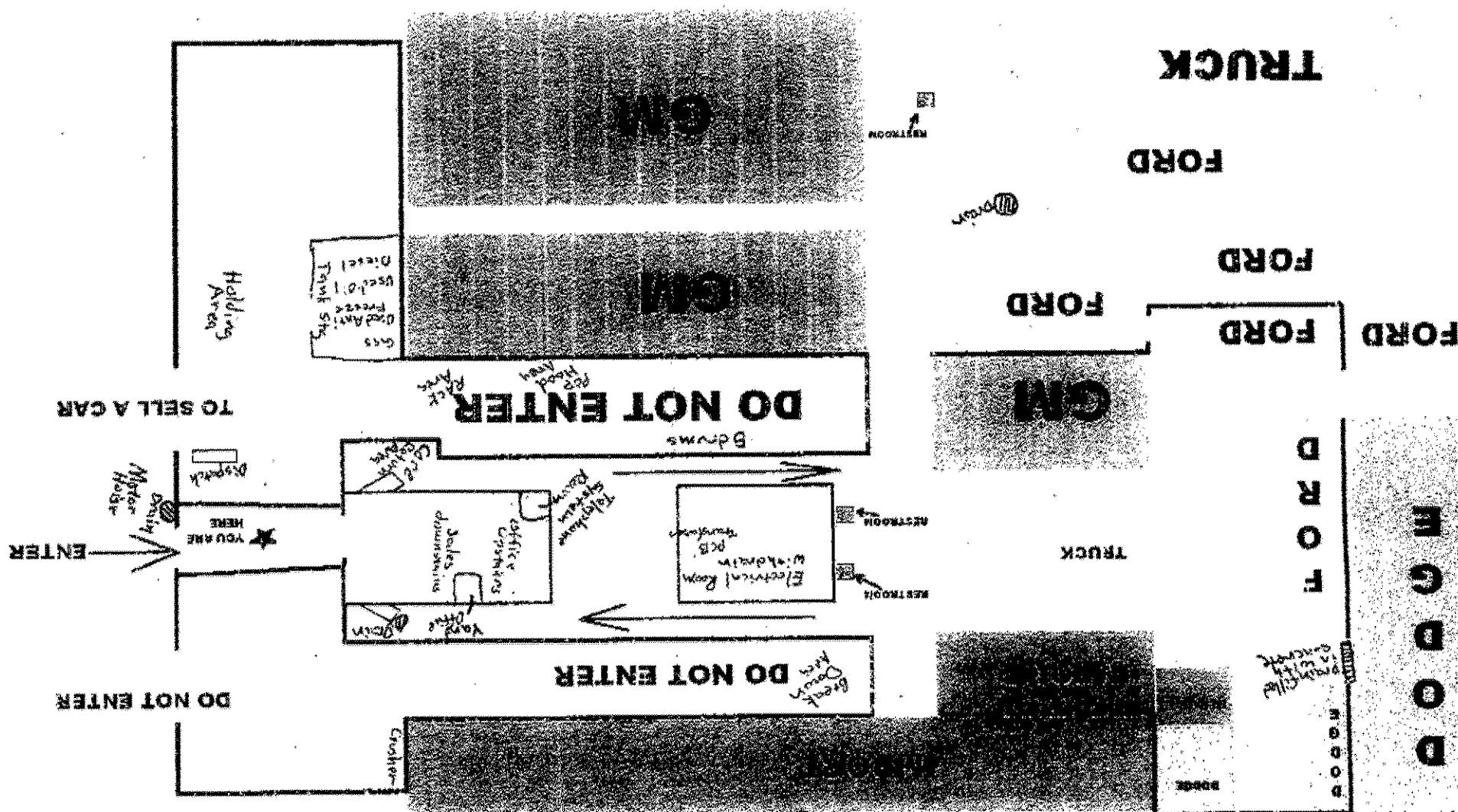
 **McCarb's**
Get Cash for
Your Junk Car Now

 **CharityCar**

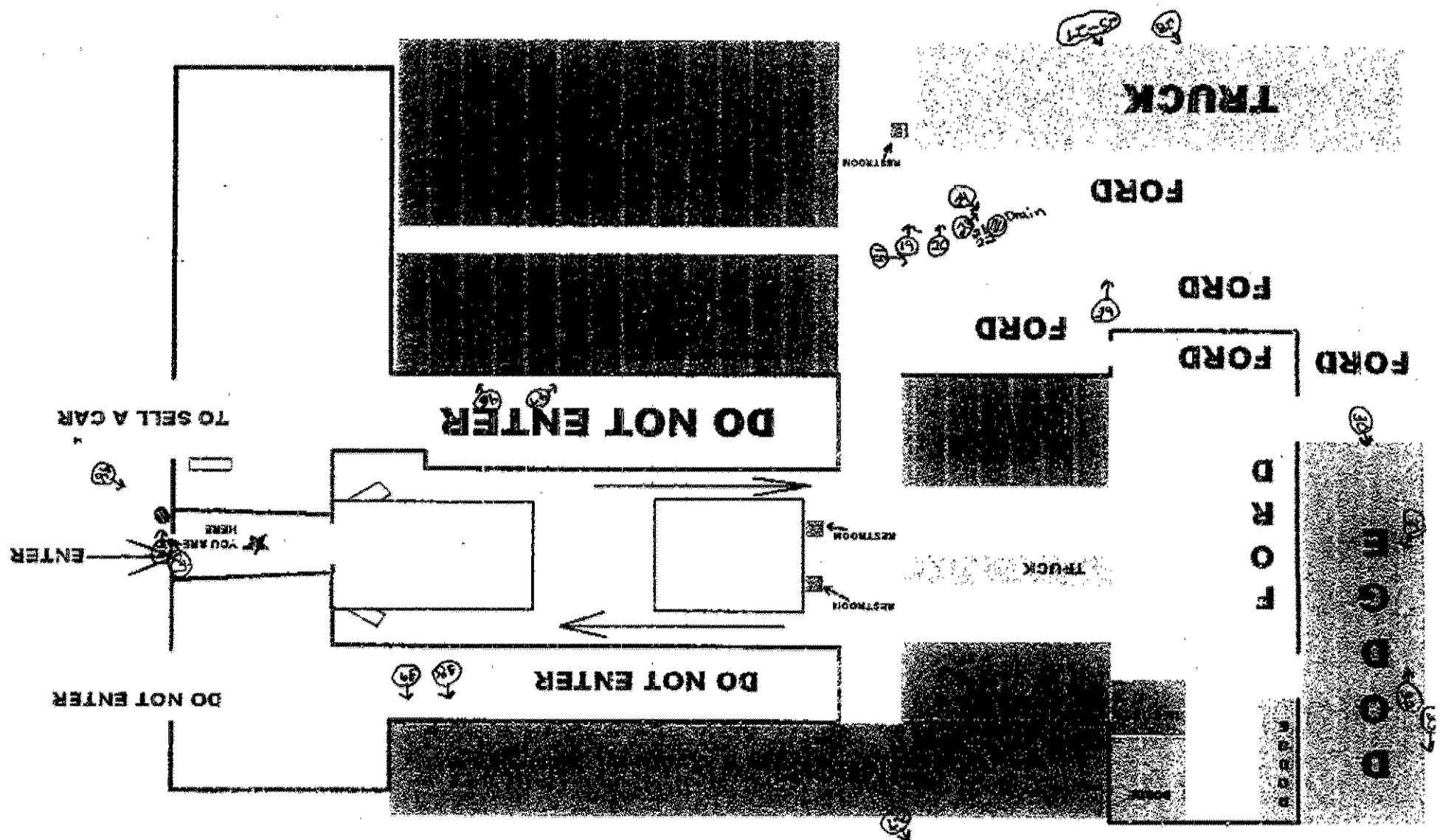
Click Here
to donate
Your Car to Charity

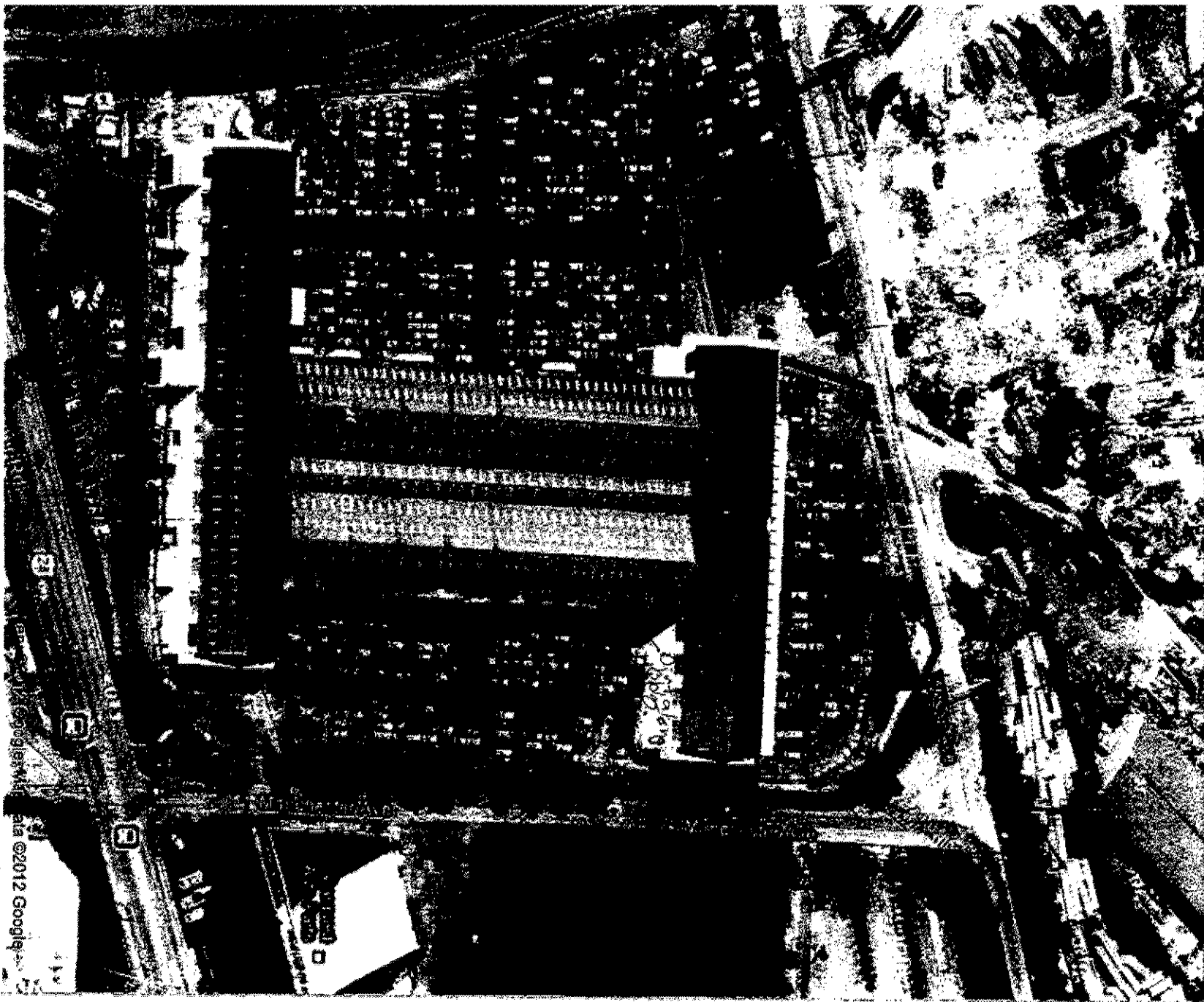
 **Car's**
Click Here to get cash
for your car now

Call 1-877-303-6384
or visit us online



= photo # and direction
U Pick It + KC, MO layout
with some photo locations
2/9-10/12 PCRA inspection





D-1000/Venue 1

2/10/12 Mr. Mervin 2/10/2012

draw areas where first (and)

is located on-site

as a reference

Print - Maps

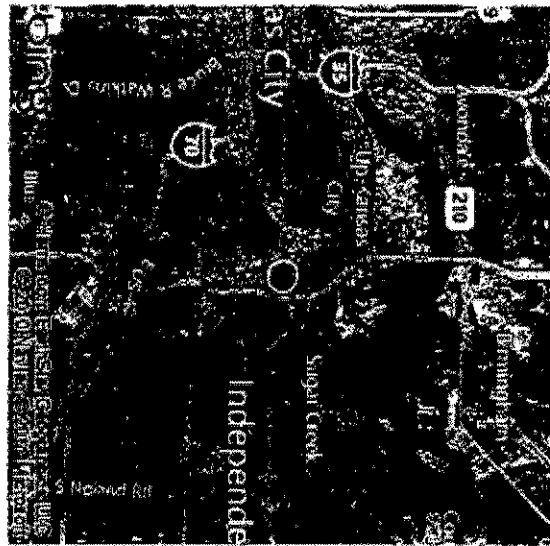
U-Pick-It

bing Maps

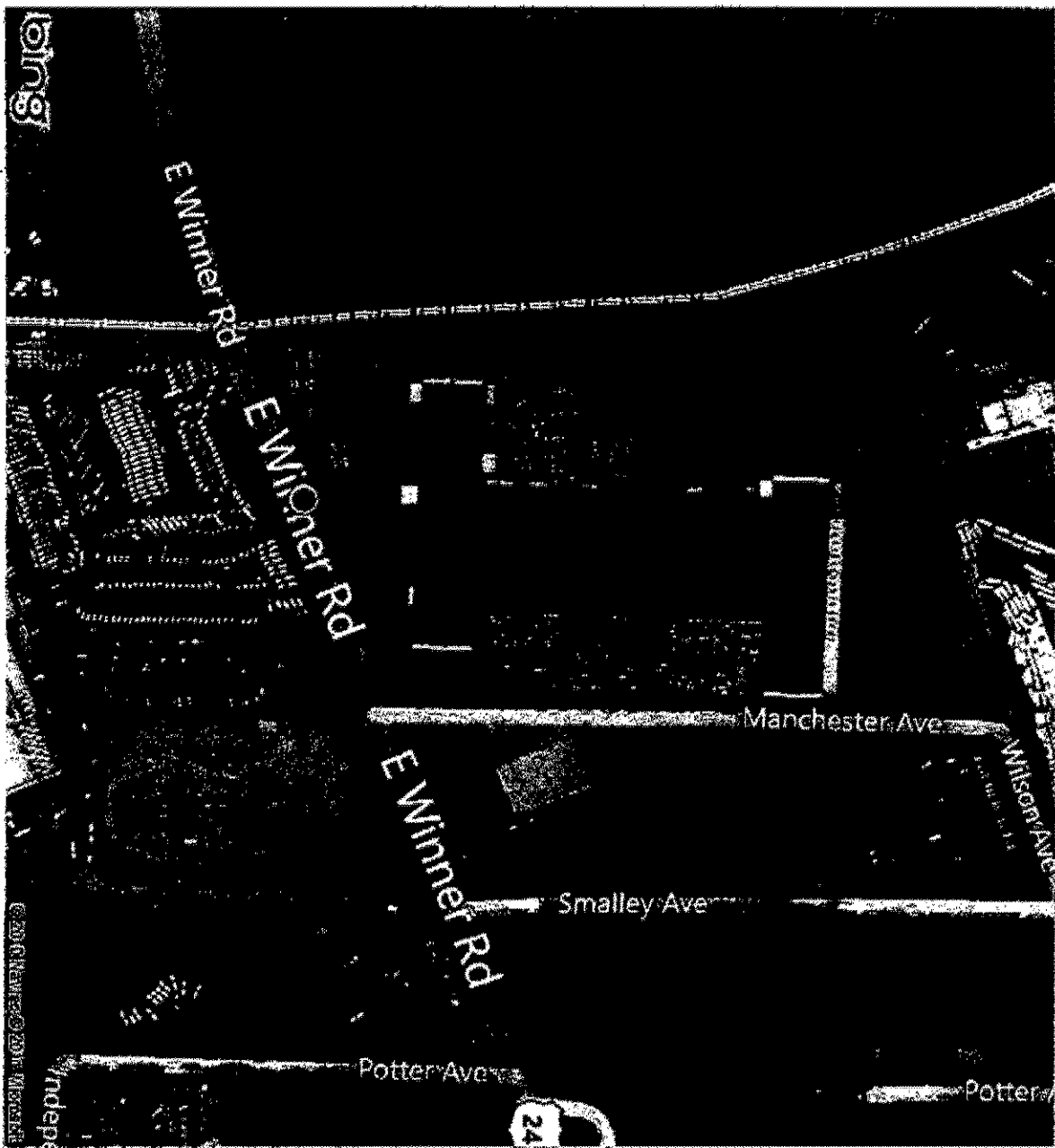
7700 E Winner Rd, Kansas City, MO 64125

My Notes

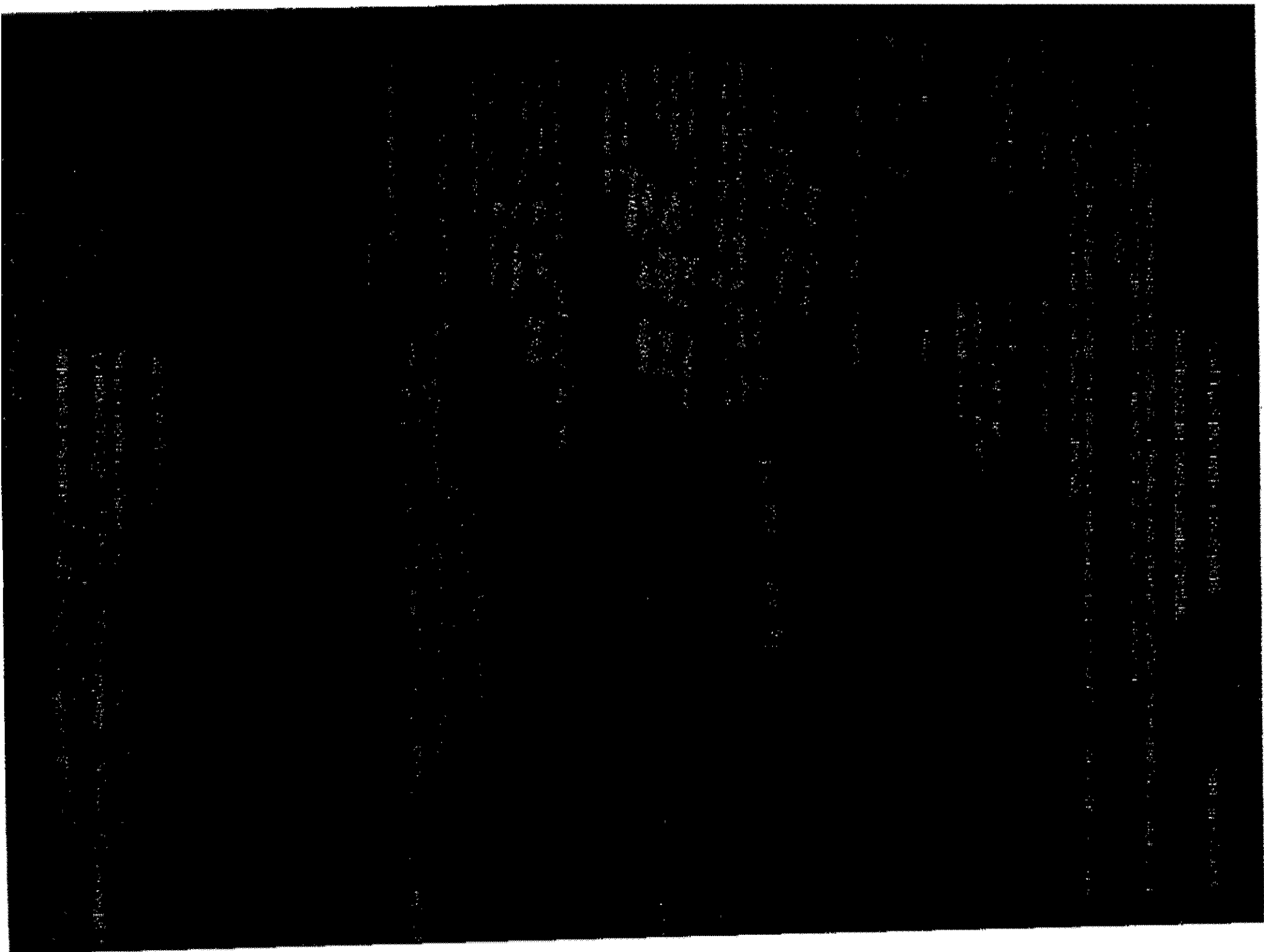
On the go? Use m.bing.com to find maps, directions, businesses, and more.



Page 1 of 1



Bird's eye view maps can't be printed, so another map view has been substituted.



1-18-1997 4:43AM FROM HI TECH ANTIFREEZE 78EE421230

P. 1

Hi-Tech Antifreeze
Recycling/PghGeniLLC.
Box 230, 530 Main
Budora, KS. 66025
785-542-1230, fax 785-542-1230
e-mail: antifreeze@sunflower.com

Attn:
Robert

I am sending you the following information about our antifreeze business. Please visit our website: www.recyclingantifreeze.com. Call the phone number or e-mail above if we can be of service to you or if you have any questions.

Hi-Tech Antifreeze provides a 50/50 pre-mix, ready-to-use, recycled coolant at less cost than recycling yourself or buying virgin antifreeze and mixing with water. Hi-Tech also provides virgin antifreeze, full strength or 50/50 premix. Call us for current prices. Let us know when your barrel is empty and we will fill it as soon as possible. Our trucks are equipped with certified flow meters that stamp your ticket showing the number of gallons delivered. This eliminates guessing on bulk deliveries.

Hi-Tech will also remove waste antifreeze at no charge whether you buy coolant or not. Call us when your waste barrel is full (minimum 50 gallons). The driver will pump out the waste barrel and leave this area as clean as he found it. Barrels or tanks will be properly labeled to meet regulations.

If you need barrels, we have opaque white (so you can see the level inside) 55 gallon drums, our/your cost is \$20.00 and 275 gallon totes (call for price). Also, the drivers have a rotary hand barrel pump for our/your cost of \$20.00.

Hi-Tech provides great service and quality products saving you time and money.

Hi-Tech Antifreeze Recycling/Pgh Geni LLC operates in compliance with all city, state and federal regulations pertaining to recycled coolant (Permit #873). Additional information provided upon request.

Thank you,

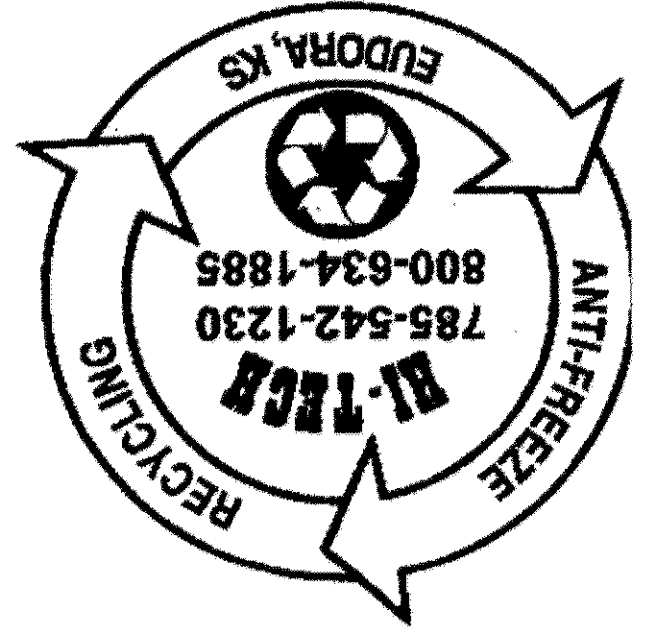
Richard Campbell
Richard Campbell

*Shanker,
M. Bailey*

HI-TECH ANTIFREEZE

RECYCLING

www.hitechantifreeze.com



E-Mail:

antifreeze@sunflower.com

How do you dispose of used antifreeze?

Answer: Call us.

We will pick up
your used antifreeze
free of charge.

Hi-Tech will pick up your used coolant for free, and you do not have to purchase coolant to receive free pickup. We will provide barrels or totes to collect used coolant. You can also purchase virgin quality recycled coolant from us (call for pricing).

Hi-Tech Antifreeze Recycling,

founded in 1991, began as

a one-man operation. Hi-

Tech's management continually

researches and explores alternative

processes as well as chemical

combinations and additives to

improve this process. Hi-Tech

has built a new facility and all

recycling is done at the plant.

The result is a laboratory tested
and approved virgin quality
product.

Hi-Tech's process removes

contaminates, including dye and

produces a clear liquid consisting

of ethylene glycol and water.

The appropriate inhibitors are

then added to make virgin quality

coolant. Currently Hi-Tech

makes four types of coolant:

automotive green, extended life

orange, universal gold and heavy

duty (wet sleeve diesels).

We make and provide a quality

product but what we really

sell is service, you will not be

disappointed.

Hi-Tech operates in compliance

with all city, state and federal

regulations (permit #873).

We provide service in Kansas,

Missouri and Nebraska

(call about other areas).

1-16-1997 4:44AM

FROM HI TECH ANTIFREEZE 7855421230

P. 2

State of Kansas

Department of Health and Environment

Bureau of Waste Management
1000 SW Jackson, Suite 320, Topeka, Kansas 66612-1346 (785) 296-1628

PERMIT

No. 873

For operating a processing facility or a solid waste disposal area
in accordance with the provisions of Kansas Statutes Annotated 65-3407

Permission is hereby granted

to HI TECH ANTIFREEZE RECYCLING/PITTSBURGH GENI, LLC
(name of governmental entity, corporation or person)to operate a SOLID WASTE PROCESSING FACILITY
RECLAMATION FACILITY - USED ANTIFREEZE RECYCLINGlocation 400 W. 6th, EUDORA
SW 1/4, SEC 5, T 13 S, R 21 E, DOUGLAS COUNTYin conformity with plans and specifications approved by the Department of Health and Environment,
and the attached general conditions:


Reference: Permit Application for a Reclamation Facility received April 25,

2005.Done at Topeka, this 22 day of July, 20 05
Department of Health and Environment

ATTACHMENT 18 Page 1 of 3

Used Anti-Freeze

H&Tech Antifreeze
P.O. Box 230
Eads, KS 66025
(785) 542-1220
www.recycleantifreeze.comDate 1-4-12
Invoice # 2316

Previous Sale #	Current Reading - Gallons	Units
Units Sold #	Gallon Reading - Return	
Sold To: U-Pick IT 7700 E. 24 Hwy Independence mo		
	Charge	Balance
Picked up 825-gal's used- AFC	N/C	
Signature: 		

Please Pay From This Invoice
No Statement Will be Sent

FROM: 1-4-12 11:33 FROM-U- PICK IT

816-457-6064

ATTACHMENT 118 Page 2 of 3


Hi-Tech Antifreeze
P.O. Box 230
Eudora, KS 66025
(785) 542-1830
www.recyclingantifreeze.com

Date: 9/13/11
Invoice # 1507

Product Code	Gallon Reading - Start	Notes
Item Code #	Gallon Reading - Finish	

Item #
U Pick It
700 E 24 Hwy
Independence, MO

	Charge	Balance
Pick up 752 US Cap and K		

Signature: 

Please Pay From This Invoice
No Statement Will be Sent

Used Anti-Freeze

816-457-6064

1-877-400-0000

1-877-400-0000

ATTACHMENT 11b Page 3 of 3

Used Anti-Freeze

HS-Tech Antifreeze
P.O. Box 230
Eudora, KS 66025
(785) 642-1230
www.mycycleantifreeze.com


Date: 7-28-11
Invoice # 5926

Previous Sale #	Current Reading - Start	End

Year Make #	Current Reading - Finish

Sold to:
U-Pick-IT
7700 E. 24 Hwy
Independence mo.

	Chgs	Balance
Picked up 175- gal's used-AFC	N/C	

Signature: 

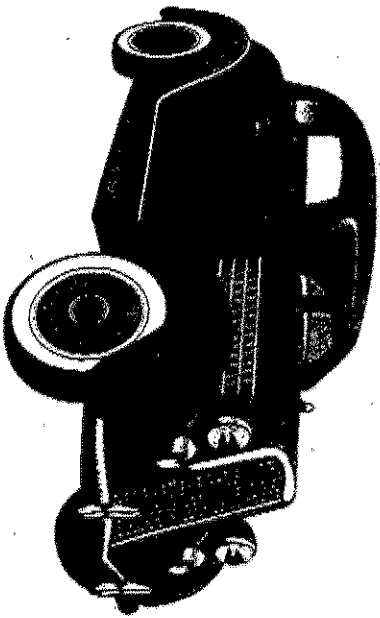
Please Pay From This Invoice
No Statement Will be Sent

W-03-16 14-01 1501-01-11

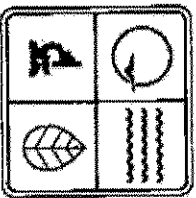
810-431-0004

T-010 H0002/0004 F-073

Preventing Pollution During Vehicle Salvage



A Guide to Environmental Compliance and Pollution Prevention for Vehicle Salvage Facilities in Missouri



Missouri Department of Natural Resources
Environmental Assistance Office
1-800-361-4827

September 2004

 Recycled Paper



PUB000394



Missouri Department of Natural Resources
"Integrity and excellence in all we do"

Antifreeze

Antifreeze is usually made of ethylene glycol, corrosion inhibitors and foam controllers. Ethylene glycol is toxic if ingested. It is particularly dangerous because animals and children are attracted to its sweet flavor. If they drink the ethylene glycol it may cause coma or death.

Some antifreeze is made of propylene glycol. This material is less hazardous to humans and animals than ethylene glycol.

The used antifreeze from a vehicle can hold contaminants that it has picked up from the vehicle engine. For example, used antifreeze may contain lead because the antifreeze has dissolved some of the lead solder in the radiator.

Waste antifreeze is not a listed hazardous waste under the federal hazardous waste regulations. However, it may be a hazardous waste depending on the contaminants it has picked up. The test used to find out if used antifreeze is a hazardous waste is called the toxicity characteristic leaching procedure (TCLP). See the Hazardous Wastes guide sheet for more information.

Recent studies have shown that antifreeze from cars and trucks manufactured after 1995 is not hazardous waste. This is primarily because less lead is used in radiator construction. Used antifreeze is more likely to be hazardous if it was used in heavy equipment such as bulldozers and buses.

This means that antifreeze from late-model cars and trucks that has not been mixed with other antifreeze or with other hazardous wastes does not need to be tested. In this case, you may assume that it is not hazardous and need not test it. However, used antifreeze from heavy equipment or industrial sources will need to be tested to see if it is hazardous waste unless you have some other way of knowing that it is or is not hazardous.

If you wish, you can assume the antifreeze from your heavy equipment is hazardous without testing it. You would then need to dispose of it as hazardous waste.

There are several ways to safely and legally manage your used antifreeze:

- Recycle the antifreeze at your facility (on-site recycling).
- Send the antifreeze to someone else to either recycle or dispose of it (off-site recycling or disposal).
- Discharge to public wastewater treatment plant if the plant has approved the discharge.

Recycling

The Missouri Department of Natural Resources strongly encourages antifreeze recycling. You can purchase or lease several types of antifreeze recycling equipment. If you want to recycle your hazardous waste antifreeze on-site you must notify the department of your recycling

activities. If you recycle 2,200 lbs. or more in a month, you need a resource recovery certification. For more information, contact the department at 1-800-361-4827. If you recycle antifreeze only from late-model cars and trucks, you do not need a resource recovery certification.

Your recycling unit will create waste such as distillation residues or used filters. You must determine if these wastes are hazardous before disposal. See the *Hazardous Waste guide* sheet for more information. If the residue is nonhazardous, it can be sent to the landfill with your regular trash. However, liquids cannot go to the landfill.

There may be businesses that will bring equipment to your facility and recycle your antifreeze on-site. Again, if the antifreeze is from late model cars and trucks, these companies do not need resource recovery certification. If it is from heavy equipment or older cars, these companies will need resource recovery certification to recycle your antifreeze.

Off-site Recycling or Disposal

There are companies that pick up used antifreeze for off-site recycling or disposal. If your used antifreeze is a hazardous waste, the transporter must have a Missouri license to transport hazardous waste and the waste must have a hazardous waste manifest with it. Make sure the facility you send it to has a resource recovery certification or a hazardous waste treatment, storage and disposal permit.

Discharge to wastewater treatment plant (pouring it down the drain)

If the drains at your facility go to a wastewater treatment plant (not a septic system), you may be able to pour antifreeze down the drain **IF** you have permission from the plant. Pouring wastes down the drain is called a discharge.

Some plants will not allow discharges of used antifreeze. Large quantities can harm the treatment plant. The wastewater treatment plant may not be able to remove all the contaminants from the used antifreeze. The contaminants then enter lakes, streams and rivers.

Remember

- **DO NOT** discharge antifreeze to a wastewater plant without permission.
- **DO NOT** discharge any hazardous waste, including antifreeze, to a septic system.
- **DO NOT** dispose of antifreeze on the ground, down storm drains or into streams or lakes.

For More Information

Missouri Department of Natural Resources
Environmental Assistance Office
P.O. Box 176
Jefferson City, MO 65102-0176
1-800-361-4827 or (573) 526-6627
www.dnr.mo.gov/oac/env_assistance.htm



Missouri Department of Natural Resources

Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems

10/2009

Hazardous Waste Program fact sheet

Used gasoline dispenser fuel filters and other fuel dispensing system wastes, such as absorbent materials, water and debris, can be toxic, ignitable and hazardous to people, property and the environment. Sometimes these wastes are illegally thrown into dumpsters or stored in ways that can lead to fires and explosions. The following guidance provides options for safely and legally managing used gasoline dispenser fuel filters and other media impacted by gasoline spills. This guidance does not pertain to the management of petroleum debris and media that is subject to 40 CFR part 280 subparts E and F.

Common Problem

The Missouri Department of Agriculture's most issued violation is gasoline dispenser fuel filters or other waste stored in the sump containment beneath the dispenser. During an inspection, the violation typically cited in the Missouri Secretary of States Code of State Regulations as 2 CSR 90-30:

"Water or product shall not be allowed to accumulate within any secondary containment facility, this includes dikes and remote impoundments. Accumulated water and/or product within a secondary containment facility shall be removed and disposed of in a manner that is in compliance with applicable rules of the Department of Natural Resources."

Gasoline dispenser fuel filters, absorbents or any other materials, including gasoline waste, may not be stored or dried in the sump containment. The sump containment is designed to hold gasoline product in the event of a release, any material stored in the sump containment reduces its capacity. The sump containment is intended only for abnormal operating conditions or emergency use. Storing gasoline dispenser fuel filters in the sump containment is also a fire hazard. Equipment in the dispenser can spark, igniting gasoline vapors and can cause a fire or explosion.

Proper management of used gasoline dispenser fuel filters

Scrap Metal Option

Metal gasoline dispenser fuel filters can be managed as scrap metal if the filters are drained of all liquids and the filters are sent for legitimate metal recycling.

Once drained and dried, metal gasoline tank dispenser filters should be stored in a closed container. The container should be labeled "scrap metal - gasoline dispenser fuel filters" and be sent to a scrap metal recycler with whom you have a written agreement and has the equipment to manage this type of metal and material. The Department of Natural Resources recommends you regularly contact your recycler to evaluate if scrap metal is being properly managed.



PUB2364

Hazardous Waste Option

Gasoline dispenser fuel filters and other related materials not destined for recycling should be considered hazardous waste since they are likely to contain enough benzene to be a toxic hazardous waste and they meet no other exemption. Gasoline dispenser fuel filters may only be considered an exempt scrap metal when drained and sent to a legitimate metal recycler.

Gasoline dispenser fuel filters intended for disposal must be managed as a hazardous waste, unless representative sampling demonstrates the wastes are not hazardous. If they contain free liquid, gasoline dispenser fuel filters are typically hazardous waste due to ignitability. If they are dry, but stored under high-heat conditions, they may spontaneously combust.

If you choose to characterize the gasoline dispenser fuel filters to determine if the waste is hazardous, the filters should be sampled for ignitability, also known as the flashpoint test, and benzene using the Toxicity Characteristic Leaching Procedure, or TCLP. If TCLP results show the wastes are at or above 0.5 mg/l (milligrams per liter) for benzene, if the filters fail the flashpoint test or if they are not tested, the gasoline dispenser fuel filters must be managed as hazardous waste. For more information about managing hazardous waste, see the fact sheet *Does Your Business Generate Hazardous Waste?* available on the department's Web site at dnr.mo.gov/pubs/pub117.pdf.

Permitted Sanitary Landfill Option

If the results of representative samples show the gasoline dispenser fuel filters are below .5 mg/l for benzene and they do not fail the flashpoint test, they are not hazardous and may be sent to a permitted sanitary landfill. Testing results must be retained for a period of three years.

Safe Gasoline Dispenser Fuel Filter Draining Practices

If managing on-site for recycling, metal gasoline tank dispenser filters must be drained and dried over a suitable container such as a drum or bucket so there is no release of gasoline product to the environment. Dry filters must then be placed in a closed container prior to being sent to a legitimate metal recycler. Absorbent materials such as pads, socks or booms used to absorb gasoline spills may be dried over an open container similar to the method used to drain and dry gasoline tank filters.

Other important draining practices are:

- Never place or drain gasoline dispenser fuel filters in a containment sump. This violates Department of Agriculture regulations.
- Do not throw gasoline dispenser fuel filters or absorbents in the trash. Wastes containing gasoline can cause fires or explosions.
- Do not dry gasoline dispenser fuel filters outdoors. Precipitation can cause the container to overflow and release gasoline waste to the environment.
- Do not drain gasoline dispenser fuel filters or absorbents to the sewer. Wastes containing gasoline can cause fires or explosions in the sewer and conventional wastewater treatment plants and septic systems are not designed to handle these wastes. Storm sewers often drain to streams and lakes, and wastes containing gasoline can cause harm to fish and other aquatic organisms
- Do not pour gasoline on the ground. Waste gasoline from the drying of gasoline dispenser fuel filters or absorbents can contaminate the land, water and drinking water wells.

Managing captured gasoline - Residual gasoline product must be managed according to guidance explained in the fact sheet *Management of Petroleum Storage Tank Wastes* available online at dnr.mo.gov/pubs/pub2040.pdf or by contacting the Hazardous Waste Program at 573-751-3176. Captured gasoline product may also be sold if it meets Missouri Department of Agriculture fuel specifications.

What contractors should know

Contractors may transport drained metal filters to a legitimate metal recycler. Additionally, contractors may store and accumulate the drained metal filters at their facility as long as the filters will be recycled as scrap metal.

However, contractors may not transport, store or accumulate hazardous gasoline dispenser fuel filters, used absorbents contaminated with gasoline or petroleum contaminated water destined for disposal, unless the contractor's site has a license, permit or certification from the state to transport or accept hazardous waste.

Ultimately, the burden rests on the generator to make a hazardous determination on filters, absorbents and petroleum contaminated water and to ensure their wastes are managed appropriately.

For more information

Missouri Department of Natural Resources
Hazardous Waste Program

P.O. Box 176
Jefferson City, MO 65102-0176
800-361-4827 or 573-751-3176
Fax 573-526-5268
dnr.mo.gov/env/hwpl/index.html

Missouri Department of Natural Resources
Hazardous Waste Program
Tanks Compliance and Enforcement Unit

P.O. Box 176
Jefferson City, MO 65102-0176
575-522-5665
tanks-compliance@dnr.mo.gov

Missouri Department of Natural Resources
Solid Waste Management Program

P.O. Box 176
Jefferson City, MO 65109-0176
800-361-4827 or 573-751-5401
Fax 573-526-3902
dnr.mo.gov/env/swmp/index.html

Missouri Department of Agriculture
Petroleum/Propane/Anhydrous Ammonia Program
P.O. Box 630
Jefferson City, MO 65101-0630
573-751-5636
mda.mo.gov/wm/ppaa.htm

02-03-16 14:41 FROM-U- PLON 11

810-437-0804

1-800-1-800-424-8300

SPENT BATTERIES PICK-UP MEMO

SEP# 131658

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING
SPILL, LEAK, FIRE OR EXPOSURE CALL TOLL FREE
DAY OR NIGHT 1-800-424-8300

EXIDE TECHNOLOGIES		CUSTOMER NAME: <u>Pick-Up</u>		PHONE NUMBER:		STORE/DC #: <u>11426727</u>	
JDE #:		STREET ADDRESS:		CITY:		STATE: <u>MO</u> ZIP: <u>63104</u>	
DOT DESCRIPTION		PRODUCT DESCRIPTION		EQUIPMENT		JDE NUMBER	
QUANTITY	CLASS	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		AUTOMOTIVE & GROUPS 1, 2, 3, & 17T		00010JUNK 8900007	
X	CLASS A	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		GROUPS 4, 5I, 3ET, 30H, EY, 6D		00015JUNK 8900018	
X	CLASS B, EY, & 6D	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		4D & 8VW-D		00039JUNK 8900019	
X	CLASS C	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		7D, 4DIT, PS-2, PS-12, PS-8		00020JUNK 8900008	
X	CLASS D	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		8D & 8VW-GD		00040JUNK 8900018	
X	CLASS H	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		LAWN & GARDEN, DC9		00005JUNK 8900011	
X	CLASS L & G	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		16TF PS-8		00025JUNK 8900020	
X	CLASS 18TF	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		8VW-AD		00035JUNK 8900021	
X	CLASS	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		MOTORCYCLE		8900012	
X	CLASS D	BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		2.5 WHEEL WEIGHT BUCKET		8900013	
X		BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		FORKLIFT BATTERY		8900014	
X		BATTERIES, WET, FILLED WITH ACID, CLASS 8, UN2794, PGII		55 GAL. DRUM WHEEL WEIGHT 2/3 FULL		8900016	
TOTALS		3		134 1/4			
WEIGHT (LBS)		134 1/4		MISCELLANEOUS			

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY
CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN THE
PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE
REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

RECEIVED AND CERTIFIED

BY: [Signature] DRIVER'S SIGNATURE

TRIP

DATE

ST

DRIVER'S SIGNATURE

STORE COPY

Battery pickup

Invoice Date	Inv Num	Remark	Unit Number	Discour Taken	Paym Amt
12/01/12	ERS 1	1:1652 0:0285	1457112		1,100.05

EXide Battery Payment

ATTACHMENT 4 Page 2 of 2

The above information is to the person made by Exide Technologies, Inc. that we have submitted your direct payment account tomorrow.
Exide no longer provides the remittance by mail. We are emailing you the remittance information. If there is any question regarding the content of the remittance information, please email us at exide@exide.com.
Thank you for your cooperation.

PHOTO LOG**Facility Name / City:** U-Pick-It.

Kansas City, MO

Facility ID #: Non-notifier**Date :** February 9-10, 2012**Photographer:** Dedriel Newsome**Type of Camera:** Olympus Stylus 720 SW, Serial #: A93671407**Digital Recording Media:** Flashcard**All digital photos were copied by:** Dedriel Newsome on 2/15/2012**All digital photos were copied to:** CD-R**Original copy is stored in:** CD-R. Digital photos were downloaded to CD-R all by Dedriel Newsome.

No changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (P2xxxxxx.jpg)	Description
1	Dedriel Newsome	02/09/12	11:05 AM	090001	2/9/2012 (facing N) – Yard Office – One unlabeled approximately 3/4th full 10-gallon tub of mercury switches containing the mercury ampules.
2	Dedriel Newsome	02/09/12	11:05 AM	090002	(facing N) – Yard Office – Close-up of one of the mercury ampules in a mercury switch located in the 10-gallon tub of mercury switches containing the mercury ampules shown in photo 1.
3	Dedriel Newsome	02/09/12	11:06 AM	090003	(facing SE) – Yard Office – Approximately 1-gallon tub of mercury ampules that had been removed from the mercury switches. Inside the tub is shown in photo 4.
4	Dedriel Newsome	02/09/12	11:06 AM	090004	Yard Office – Approximately 1-gallon tub of mercury ampules that had been removed from the mercury switches. The tub is shown in photos 3 and 5.
5	Dedriel Newsome	02/09/12	11:07 AM	090005	Yard Office – Approximately 1-gallon tub of mercury ampules that had been removed from the mercury switches. Inside the tub is shown in photo 4.
6	Dedriel Newsome	02/09/12	11:09 AM	090006	(facing SE) – Telephone System Room – One open unlabeled box of 11 spent lamps being stored. Inside the box is shown in photo 7.
7	Dedriel Newsome	02/09/12	11:10 AM	090007	Telephone System Room – Inside the box of 11 spent lamps being stored. The box is shown in photo 6.
8	Dedriel Newsome	02/09/12	11:26 AM	090008	(facing N) – Storage Tank Room – Spent gasoline line filters being stored inside the gasoline tank containment unit that had about an inch of waste gasoline.
9	Dedriel Newsome	02/09/12	11:27 AM	090009	(facing NE) – Storage Tank Room – Storage tanks with containment (from left to right) used oil, used anti-freeze, and waste gasoline. Spills on floor dry observed on floor.
10	Dedriel Newsome	02/09/12	11:27 AM	090010	(facing NE) – Storage Tank Room – Spent gasoline line filters being stored outside the gasoline tank containment unit.
11	Dedriel Newsome	02/09/12	11:28 AM	090011	(facing NE) – Storage Tank Room – Storage tanks with containment (from left to right) used oil, used anti-freeze, and waste gasoline. Spills on floor dry observed on floor.
12	Dedriel Newsome	02/09/12	11:40 AM	090012	(facing NE) – Pop Hood Area – Two black approximately full unknown 5-gallon pails that were removed from scrap cars the beginning of last week (around 1/30/2012). One in poor condition and labeled used anti-freeze and the other had a product label for some type of finish.
13	Dedriel Newsome	02/09/12	11:45 AM	090013	(facing SE) – Area that is NE of the Pop Hood Area – Five 55-gallon drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. Mr. Moran estimated that the total volume between all five (3 approx. full and 2 partially filled) would equal about four full drums. They were all open with no labels. Close-ups of inside the drums are shown in photos 14, 15 and 17.

Report Photo #	Photographer	Date	Approx. Time	File Name (P2xxxxxx.jpg)	Description
14	Dedriel Newsome	02/09/12	11:45 AM	090014	(facing SE) – Area that is NE of the Pop Hood Area – Close-up of the drums shown in photo 13. Drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. They were all open with no labels.
15	Dedriel Newsome	02/09/12	11:45 AM	090015	Area that is NE of the Pop Hood Area – Close-up of the drums shown in photo 13. Drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. They were all open with no labels.
16	Dedriel Newsome	02/09/12	11:46 AM	090016	(facing SE) – Area that is NE of the Pop Hood Area – Five 55-gallon drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. Mr. Moran estimated that the total volume between all five (3 approx. full and 2 partially filled) would equal about four full drums. They were all open with no labels. Close-ups of inside the drums are shown in photos 14, 15 and 17. Spills also observed around the drums.
17	Dedriel Newsome	02/09/12	11:47 AM	090017	Area that is NE of the Pop Hood Area – Close-up of the drums shown in photo 13. Drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. They were all open with no labels.
18	Dedriel Newsome	02/09/12	11:50 AM	090018	(facing N) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on the ground.
19	Dedriel Newsome	02/09/12	11:50 AM	090019	(facing W) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground.
20	Dedriel Newsome	02/09/12	11:50 AM	090020	(facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground and stain leading to drain. Close-ups shown in photos 21 through 24.
21	Dedriel Newsome	02/09/12	11:51 AM	090021	(facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills observed on the ground and stain leading to drain. See photo 20.
22	Dedriel Newsome	02/09/12	11:51 AM	090022	(facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills observed on the ground and stain leading to drain. Close-up of photo 21.
23	Dedriel Newsome	02/09/12	11:51 AM	090023	(facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground and stain leading to drain. Close-up of oil spill to drain shown in photo 20.
24	Dedriel Newsome	02/09/12	11:52 AM	090024	(facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground and stain leading to drain. Close-up of oil spill to drain shown in photo 20.
25	Dedriel Newsome	02/09/12	11:55 AM	090025	(facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on a concrete pad with no containment and water puddle with oil sheen next to pad. Close-ups shown in photos 26 and 27.
26	Dedriel Newsome	02/09/12	11:55 AM	090026	(facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Close-up of oil sheen in water puddle on ground shown in photo 25.
27	Dedriel Newsome	02/09/12	11:56 AM	090027	(facing E) – Area on West Side of Site (see attachment 8C for photo location) – Close-up of oil spills and stains and water puddle in photo 25.
28	Dedriel Newsome	02/09/12	11:56 AM	090028	(facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on a concrete pad with no containment.
29	Dedriel Newsome	02/09/12	11:59 AM	090029	(facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil stains observed tracked on dirt drive way between the rows of scrap cars.
30	Dedriel Newsome	02/09/12	12:04 PM	090030	(facing E) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years.
31	Dedriel Newsome	02/09/12	12:05 PM	090031	(facing SE) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years.

Report Photo #	Photographer	Date	Approx. Time	File Name (P2xxxxxx.jpg)	Description
32	Dedriel Newsome	02/09/12	12:06 PM	090032	(facing W) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years.
33	Dedriel Newsome	02/09/12	12:06 PM	090033	(facing E) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years.
34	Dedriel Newsome	02/09/12	12:15 PM	090034	(facing N) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground.
35	Dedriel Newsome	02/09/12	12:15 PM	090035	(facing NE) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground.
36	Dedriel Newsome	02/09/12	12:16 PM	090036	(facing S) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground.
37	Dedriel Newsome	02/09/12	12:16 PM	090037	(facing NE) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground.
38	Dedriel Newsome	02/09/12	12:22 PM	090038	(facing E) – Crusher Area where engines and transmissions are pulled – Scrap parts bin with thick layer of oily floor dry.
39	Dedriel Newsome	02/09/12	12:22 PM	090039	(facing E) – Crusher Area where engines and transmissions are pulled – Scrap parts bin with thick layer of oily floor dry.
40	Dedriel Newsome	02/10/12	10:07 AM	100040	(facing SW) – Rack Area where vehicle fluids (gasoline, diesel, oil, antifreeze, transmission fluid) are drained. Thick layer of contaminated floor dry on floor.
41	Dedriel Newsome	02/10/12	10:08 AM	100041	(facing SE) – Electrical Room – Old PCB containing transformer to be removed.
42	Dedriel Newsome	02/10/12	10:08 AM	100042	(facing S) – Electrical Room – Old PCB containing transformer unit to be removed and area where old unit that was removed was located.
43	Dedriel Newsome	02/10/12	10:09 AM	100043	(facing SE) – Electrical Room – Area where old PCB containing transformer was removed located next to the transformer unit to be removed.
44	Dedriel Newsome	02/10/12	10:10 AM	100044	(facing SE) – Electrical Room – Old PCB containing transformer unit to be removed with close-up of catch pan.
45	Dedriel Newsome	02/10/12	10:12 AM	100045	(facing SW) – Core Return Area – Tote where used oil is accumulated including the used oil generated from household do-it-yourselfers.
46	Dedriel Newsome	02/10/12	10:14 AM	100046	(facing SW) – Rack Area where vehicle fluids (gasoline, diesel, oil, antifreeze, transmission fluid) are drained. Thick layer of contaminated floor dry on floor.
47	Dedriel Newsome	02/10/12	10:14 AM	100047	(facing NW) – Pop Hood Area – Area where vehicle fluids are pumped out including power steering, brake fluid, and windshield wiper fluid. Also, tire lug nuts are loosened and trash, batteries and mercury switches are removed. Two piles of trash to be added into a crushed car for disposal.
48	Dedriel Newsome	02/10/12	10:16 AM	100048	(facing NE) – Area on South Side of Site at Customer Entrance (see attachment 8C for photo location) – Apparent oil stains observed on the concrete ground under yellow engine hoist leading to drain located behind concrete barriers. Close-ups shown in photos 49 and 50.
49	Dedriel Newsome	02/10/12	10:16 AM	100049	(facing W) – Area on South Side of Site at Customer Entrance (see attachment 8C for photo location) – Apparent oil stains observed on the concrete ground leading from engine hoist area shown in photo 48 to drain located behind concrete barriers.
50	Dedriel Newsome	02/10/12	10:16 AM	100050	(facing SW) – Area on South Side of Site at Customer Entrance (see attachment 8C for photo location) – Apparent oil stains observed on the concrete ground under yellow engine hoist leading to drain located behind concrete barriers shown in photos 48 and 49.
51	Dedriel Newsome	02/10/12	10:19 AM	100051	(facing NE) – Yard Office – 1-gallon tub of mercury ampules on file cabinet and desk where ampules are removed from switches without containment.

U-Pick-It Photographs

Kansas City, MO

2/9-10/2012

Photos taken by Dedriel Newsome *DN*

U-Pick-It, Kansas City, MO



PHOTO 1, 2/9/2012 (facing N) – Yard Office – One unlabeled approximately 3/4th full 10-gallon tub of mercury switches containing the mercury ampules. D. Newsome

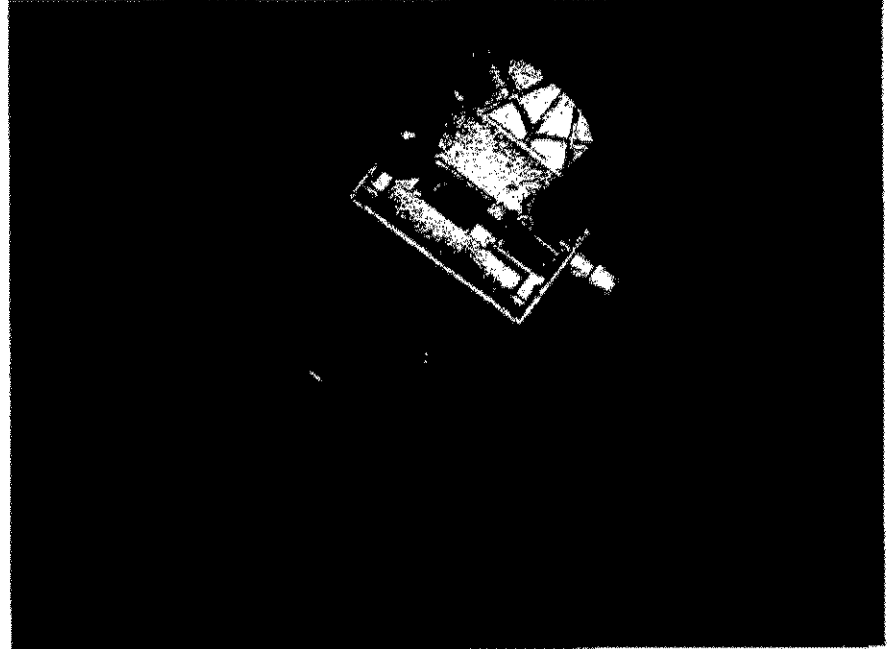


PHOTO 2, 2/9/2012 (facing N) – Yard Office – Close-up of one of the mercury ampules in a mercury switch located in the 10-gallon tub of mercury switches containing the mercury ampules shown in photo 1. D. Newsome

U-Pick-It, Kansas City, MO



PHOTO 3, 2/9/2012 (facing SE) – Yard Office – Approximately 1-gallon tub of mercury ampules that had been removed from the mercury switches. Inside the tub is shown in photo 4. D. Newsome *DN*



PHOTO 4, 2/9/2012 – Yard Office – Approximately 1-gallon tub of mercury ampules that had been removed from the mercury switches. The tub is shown in photos 3 and 5. D. Newsome *DN*

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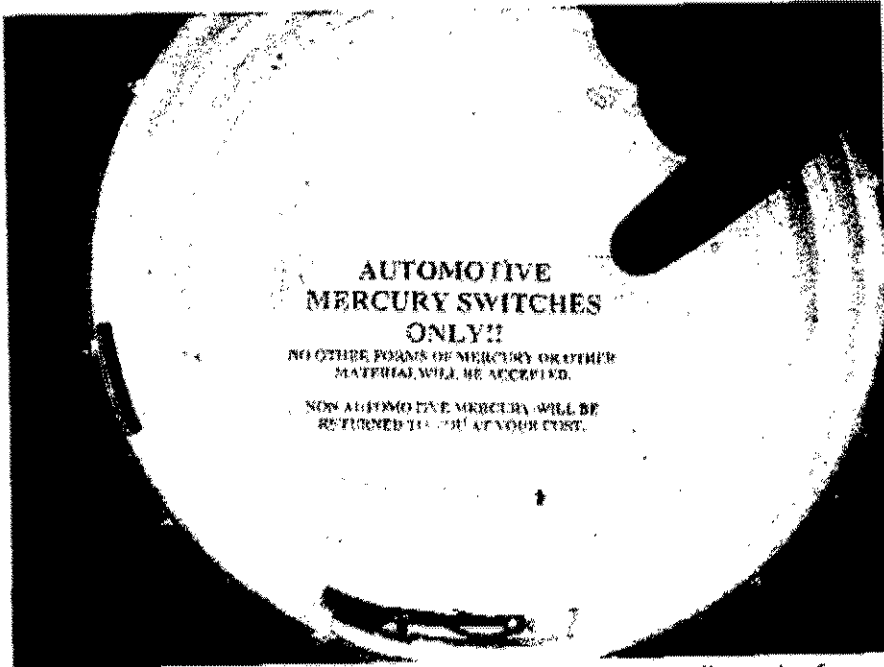


PHOTO 5, 2/9/2012 – Yard Office – Approximately 1-gallon tub of mercury ampules that had been removed from the mercury switches. Inside the tub is shown in photo 4. D. Newsome

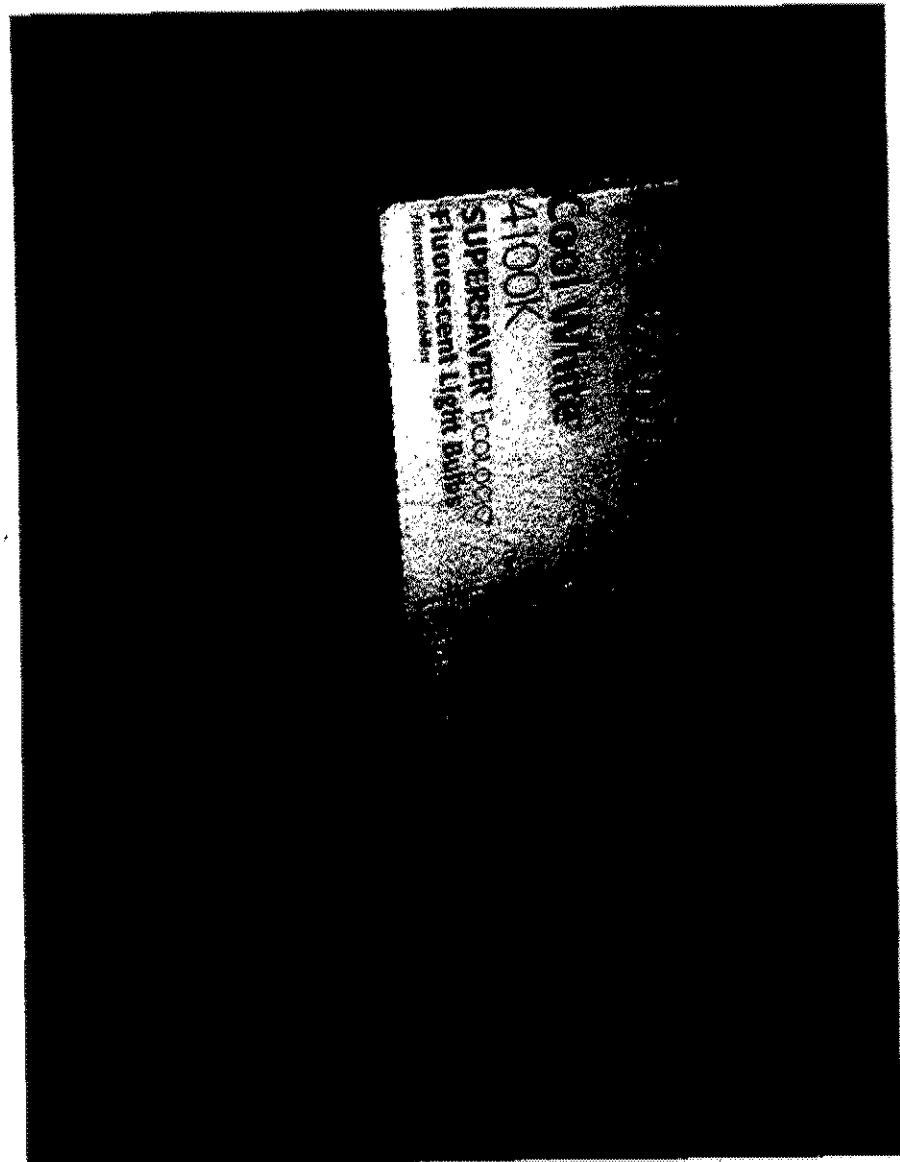


PHOTO 6, 2/9/2012 (facing SE) – Telephone System Room – One open unlabeled box of 11 spent lamps being stored. Inside the box is shown in photo 7. D. Newsome

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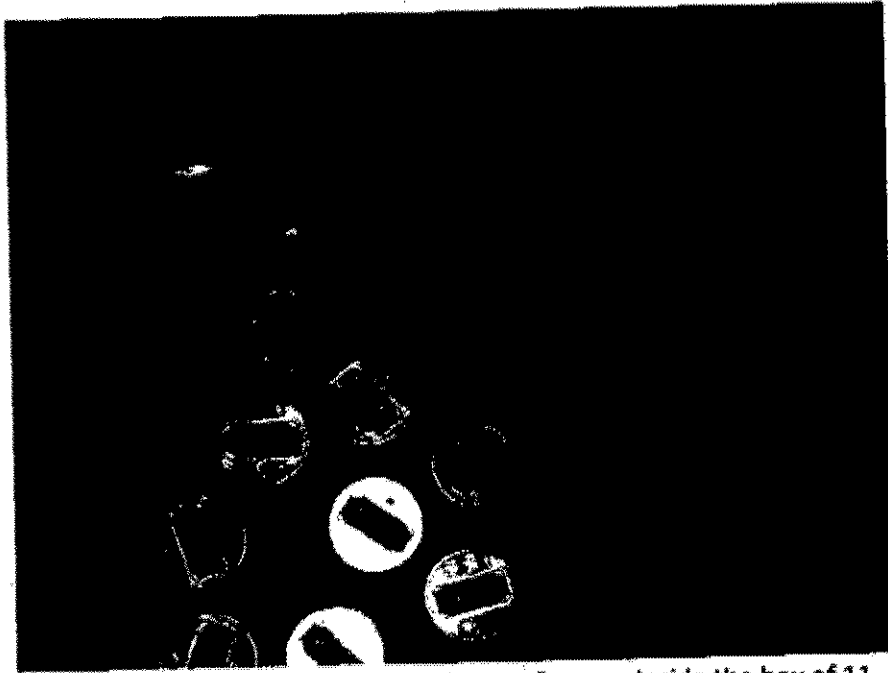


PHOTO 7, 2/9/2012 – Telephone System Room – Inside the box of 11 spent lamps being stored. The box is shown in photo 6. D. Newsome *DN*



PHOTO 8, 2/9/2012 (facing N) – Storage Tank Room – Spent gasoline line filters being stored inside the gasoline tank containment unit that had about and inch of waste gasoline. D. Newsome *DN*

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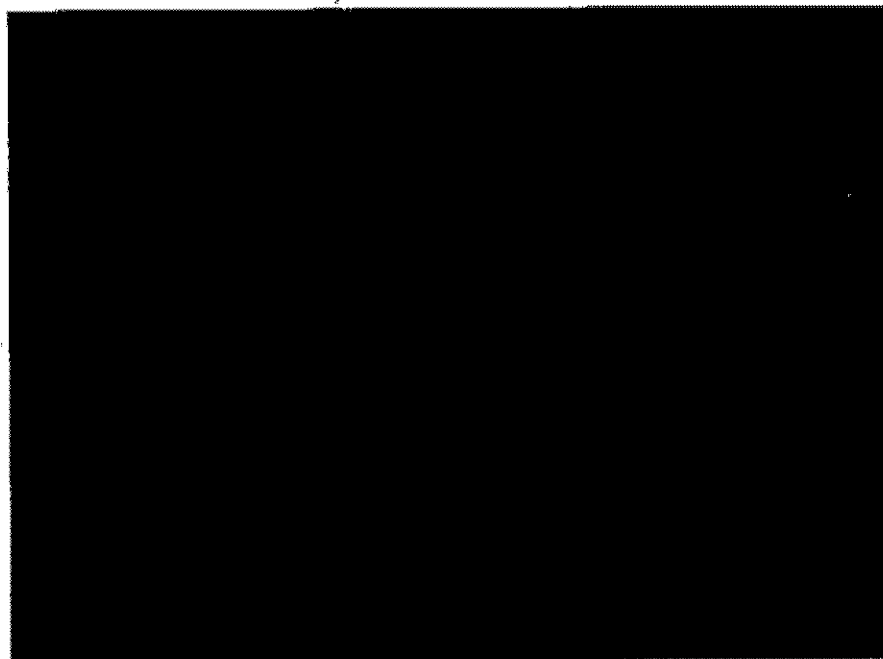


PHOTO 9, 2/9/2012 (facing NE) – Storage Tank Room – Storage tanks with containment (from left to right) used oil, used anti-freeze, and waste gasoline. Spills on floor dry observed on floor. D. Newsome

DN



PHOTO 10, 2/9/2012 (facing NE) – Storage Tank Room – Spent gasoline line filters being stored outside the gasoline tank containment unit. D. Newsome

DN

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PHOTO 11, 2/9/2012 (facing NE) – Storage Tank Room – Storage tanks with containment (from left to right) used oil, used anti-freeze, and waste gasoline. Spills on floor dry observed on floor.
D. Newsome *DN*



PHOTO 12, 2/9/2012 (facing NE) – Pop Hood Area – Two black approximately full unknown 5-gallon pails that were removed from scrap cars the beginning of last week (around 1/30/2012). One in poor condition and labeled used anti-freeze and the other had a product label for some type of finish. D. Newsome *DN*

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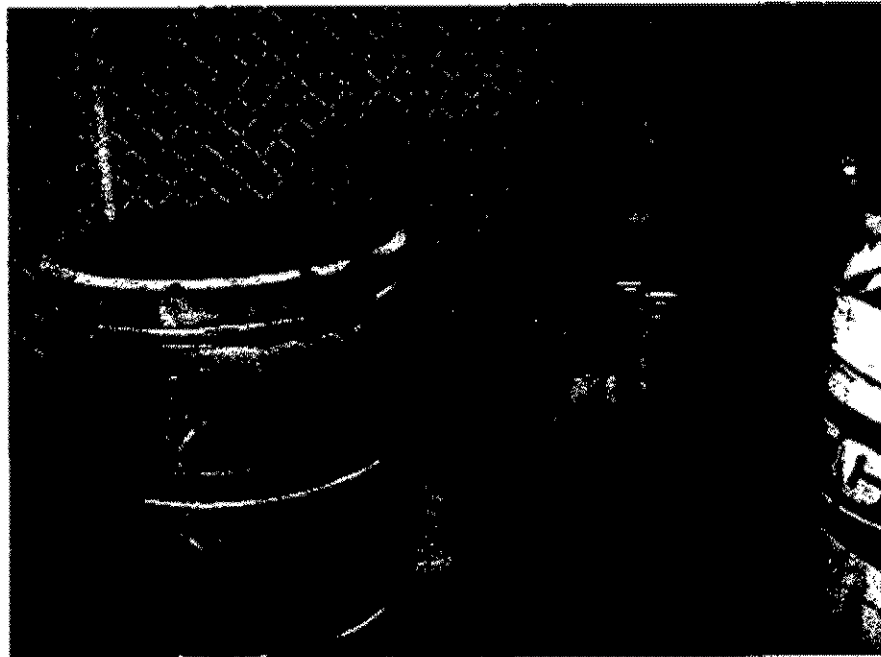


PHOTO 13, 2/9/2012 (facing SE) – Area that is NE of the Pop Hood Area – Five 55-gallon drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. Mr. Moran estimated that the total volume between all five (3 approx. full and 2 partially filled) would equal about four full drums. They were all open with no labels. Close-ups of inside the drums are shown in photos 14, 15 and 17. D. Newsome



PHOTO 14, 2/9/2012 (facing SE) – Area that is NE of the Pop Hood Area – Close-up of the drums shown in photo 13. Drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. They were all open with no labels. D. Newsome

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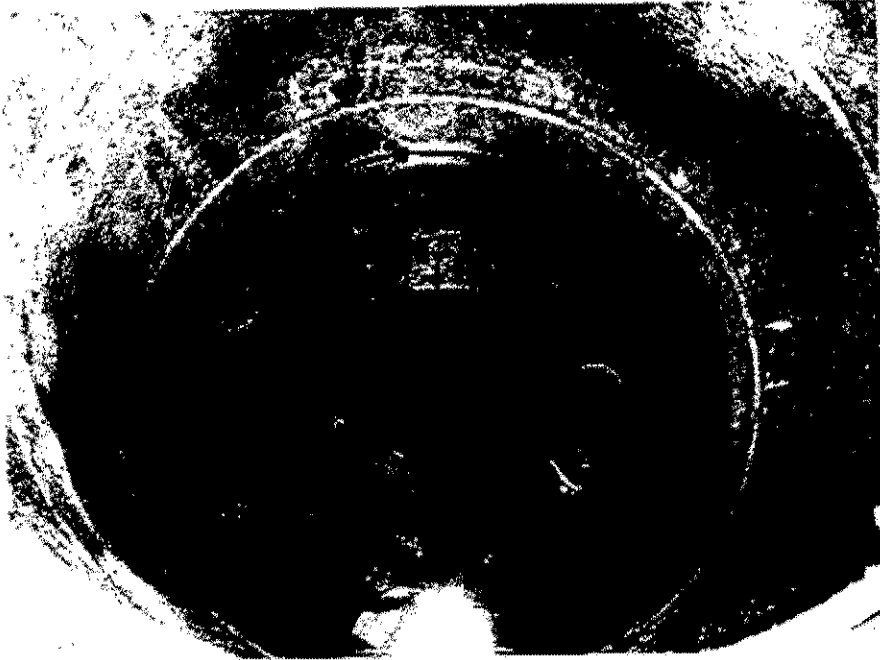


PHOTO 15, 2/9/2012 – Area that is NE of the Pop Hood Area – Close-up of the drums shown in photo 13. Drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. They were all open with no labels. D. Newsome *DW*

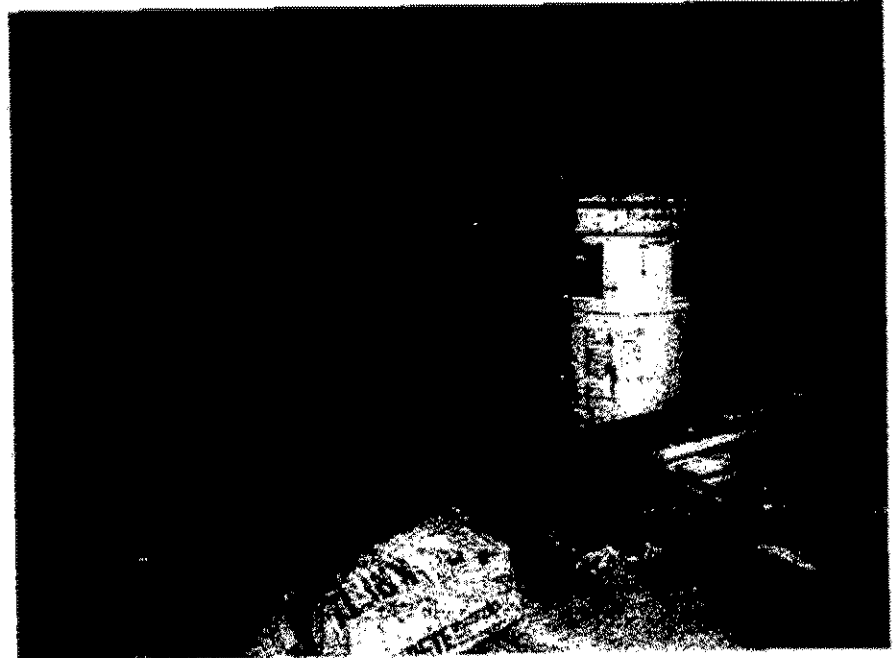


PHOTO 16, 2/9/2012 (facing SE) – Area that is NE of the Pop Hood Area – Five 55-gallon drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. Mr. Moran estimated that the total volume between all five (3 approx. full and 2 partially filled) would equal about four full drums. They were all open with no labels. Close-ups of inside the drums are shown in photos 14, 15 and 17. Spills also observed around the drums. D. Newsome *DW*

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PHOTO 17, 2/9/2012 – Area that is NE of the Pop Hood Area – Close-up of the drums shown in photo 13. Drums of waste removed from the Rack Area used oil sump about 6 to 8 months ago. They were all open with no labels. D. Newsome

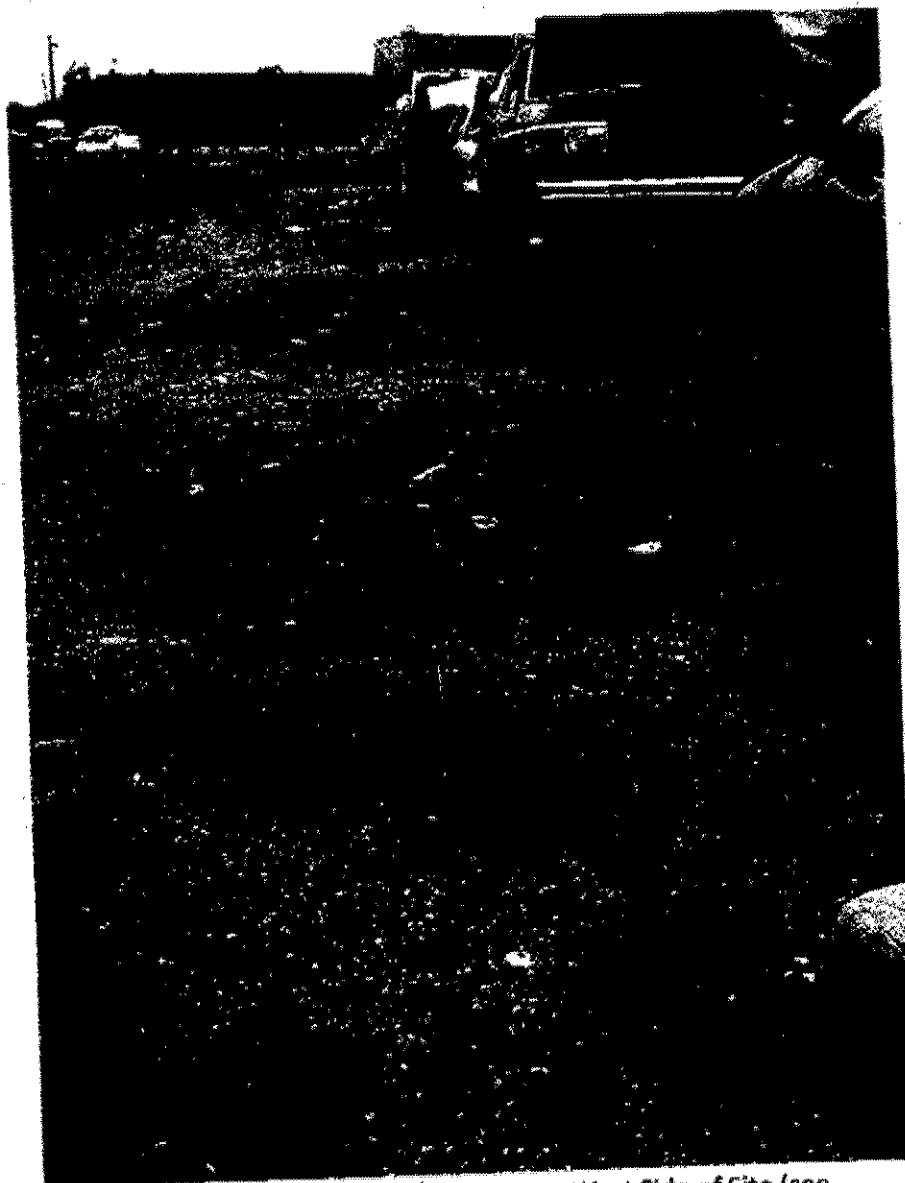


PHOTO 18, 2/9/2012 (facing N) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on the ground. D. Newsome

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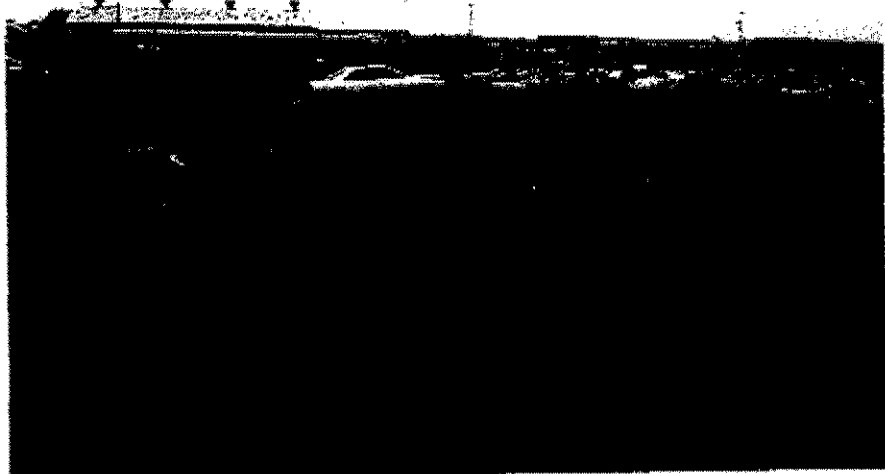


PHOTO 19, 2/9/2012 (facing W) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground. D. Newsome



PHOTO 20, 2/9/2012 (facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground and stain leading to drain. Close-ups shown in photos 21 through 24. D. Newsome

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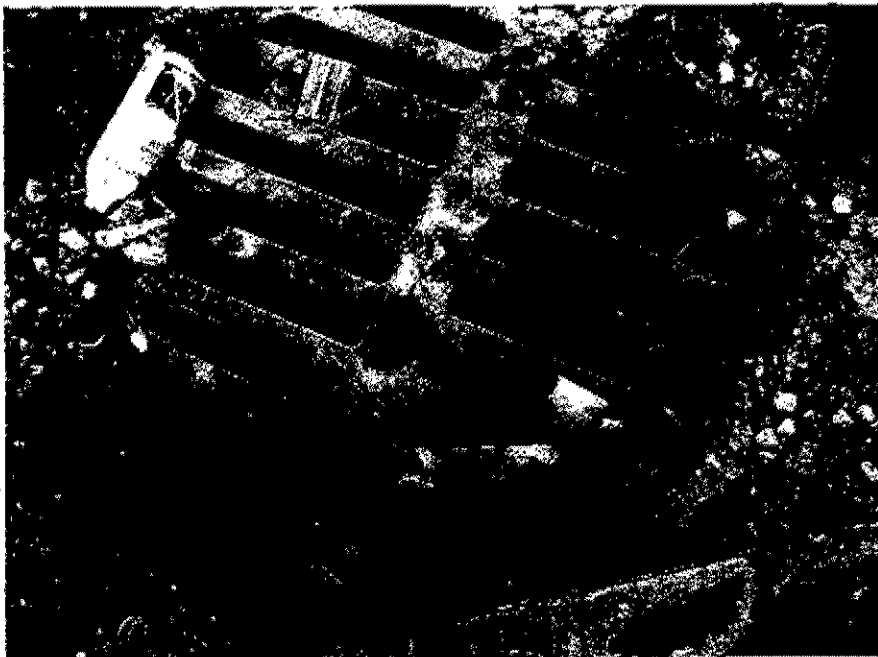


PHOTO 21, 2/9/2012 (facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills observed on the ground and stain leading to drain. See photo 20. D. Newsome



PHOTO 22, 2/9/2012 (facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills observed on the ground and stain leading to drain. Close-up of photo 21. D. Newsome

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PHOTO 23, 2/9/2012 (facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground and stain leading to drain. Close-up of oil spill to drain shown in photo 20. D. Newsome

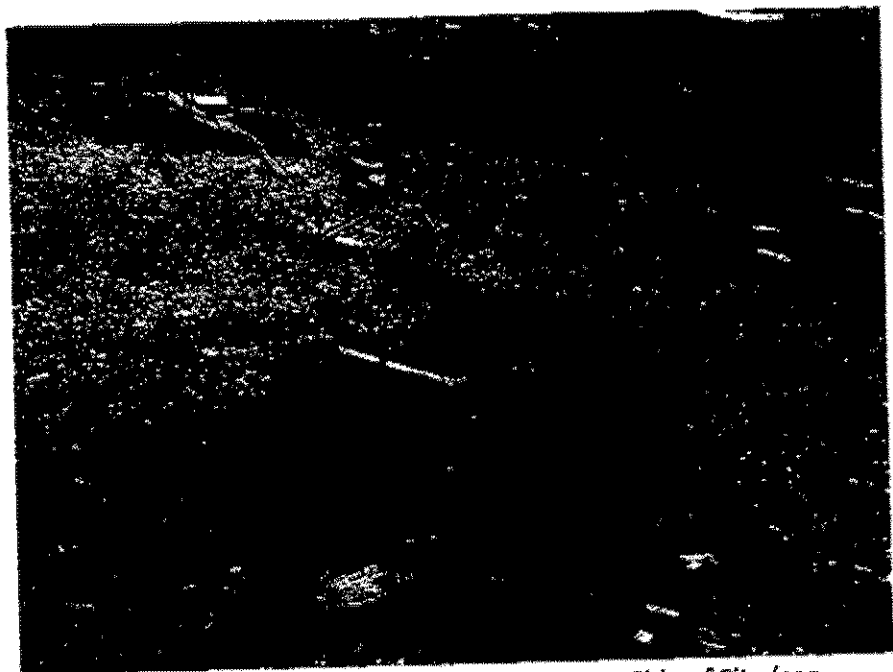


PHOTO 24, 2/9/2012 (facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on the ground and stain leading to drain. Close-up of oil spill to drain shown in photo 20. D. Newsome

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PHOTO 25, 2/9/2012 (facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on a concrete pad with no containment and water puddle with oil sheen next to pad. Close-ups shown in photos 26 and 27.
D. Newsome

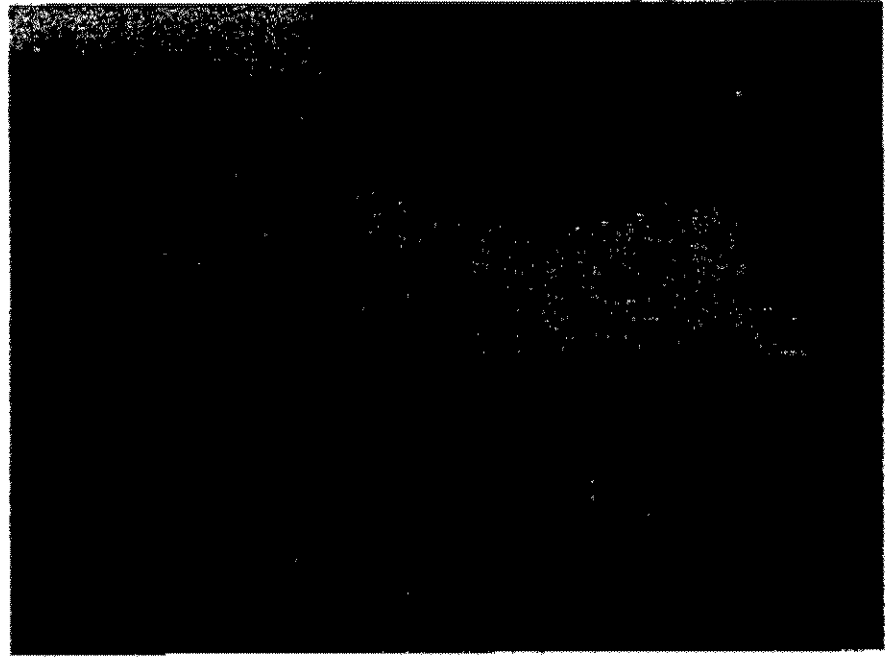


PHOTO 26, 2/9/2012 (facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Close-up of oil sheen in water puddle on ground shown in photo 25. D. Newsome

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PHOTO 27, 2/9/2012 (facing E) – Area on West Side of Site (see attachment 8C for photo location) – Close-up of oil spills and stains and water puddle in photo 25. D. Newsome

DN



PHOTO 28, 2/9/2012 (facing NE) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on a concrete pad with no containment. D. Newsome

DN

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PHOTO 29, 2/9/2012 (facing NW) – Area on West Side of Site (see attachment 8C for photo location) – Apparent oil stains observed tracked on dirt drive way between the rows of scrap cars.
D. Newsome *DN*



PHOTO 30, 2/9/2012 (facing E) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years. D. Newsome *DN*

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PHOTO 31, 2/9/2012 (facing SE) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil spills and stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years.
D. Newsome *DN*



PHOTO 32, 2/9/2012 (facing W) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years.
D. Newsome *DN*

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PHOTO 33, 2/9/2012 (facing E) – Area on North Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on concrete pad that Mr. Moran believed was covered in millings to fill in holes in the concrete pad over the years. D. Newsome



PHOTO 34, 2/9/2012 (facing N) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground. D. Newsome

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PHOTO 35, 2/9/2012 (facing NE) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground. D. Newsome



PHOTO 36, 2/9/2012 (facing S) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground. D. Newsome

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PHOTO 37, 2/9/2012 (facing NE) – Area on East Side of Site (see attachment 8C for photo location) – Apparent oil stains observed on a concrete pad with no containment and ground. D. Newsome *DN*

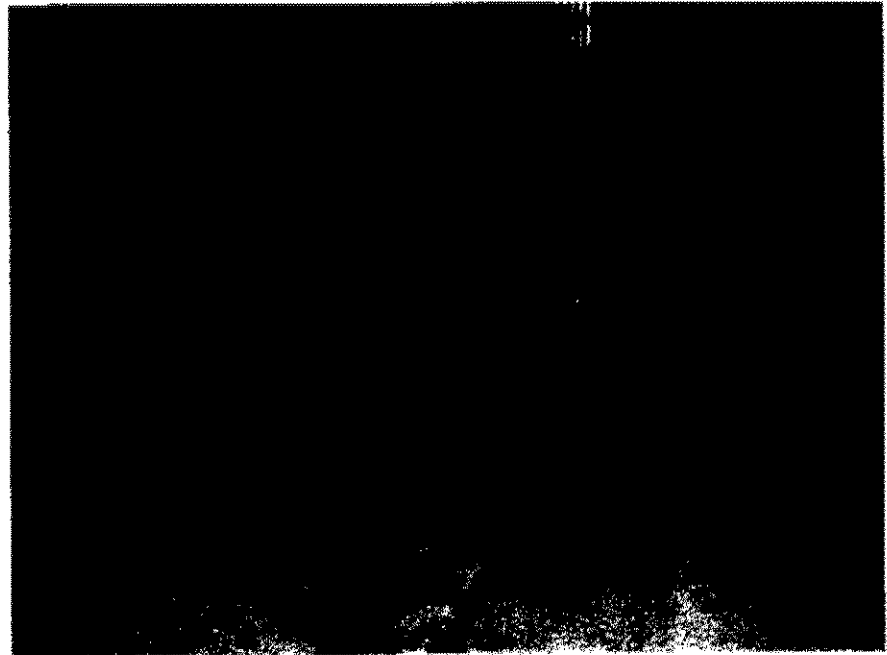


PHOTO 38, 2/9/2012 (facing E) – Crusher Area where engines and transmissions are pulled – Scrap parts bin with thick layer of oily floor dry. D. Newsome *DN*

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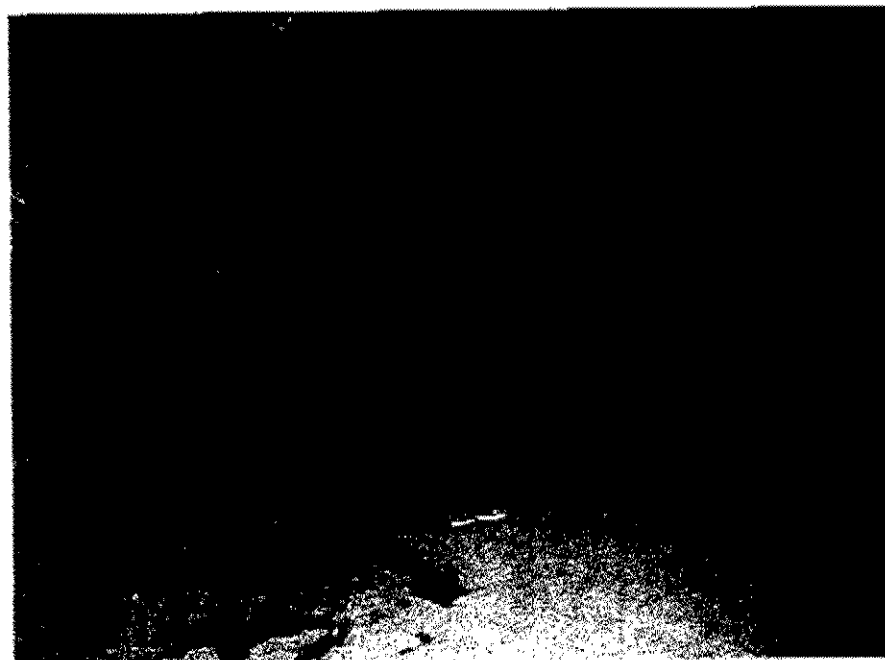


PHOTO 39, 2/9/2012 (facing E) – Crusher Area where engines and transmissions are pulled – Scrap parts bin with thick layer of oily floor dry. D. Newsome *DN*

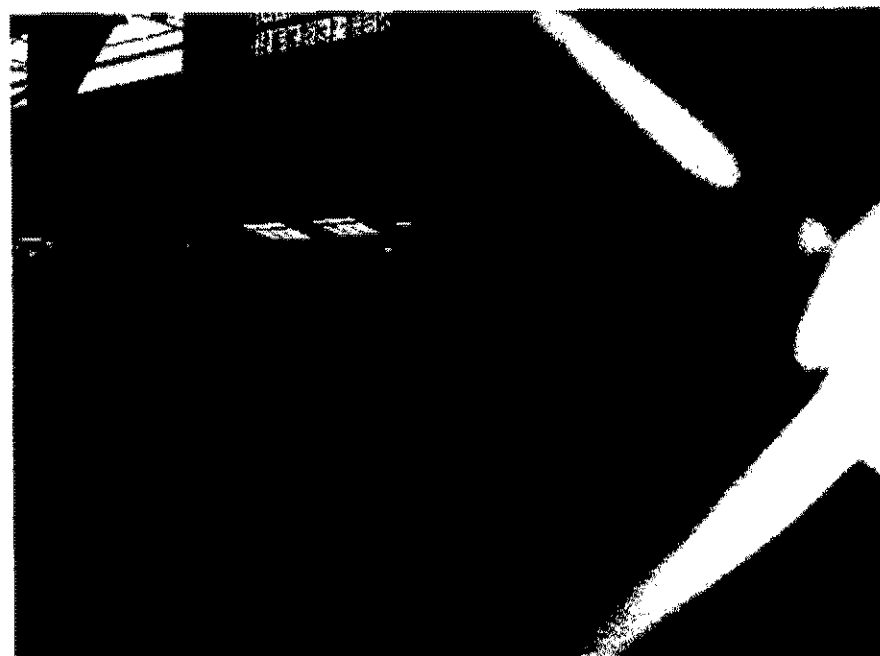


PHOTO 40, 2/10/2012 (facing SW) – Rack Area where vehicle fluids (gasoline, diesel, oil, antifreeze, transmission fluid) are drained. Thick layer of contaminated floor dry on floor. D. Newsome *DN*

U-Pick-It, Kansas City, MO

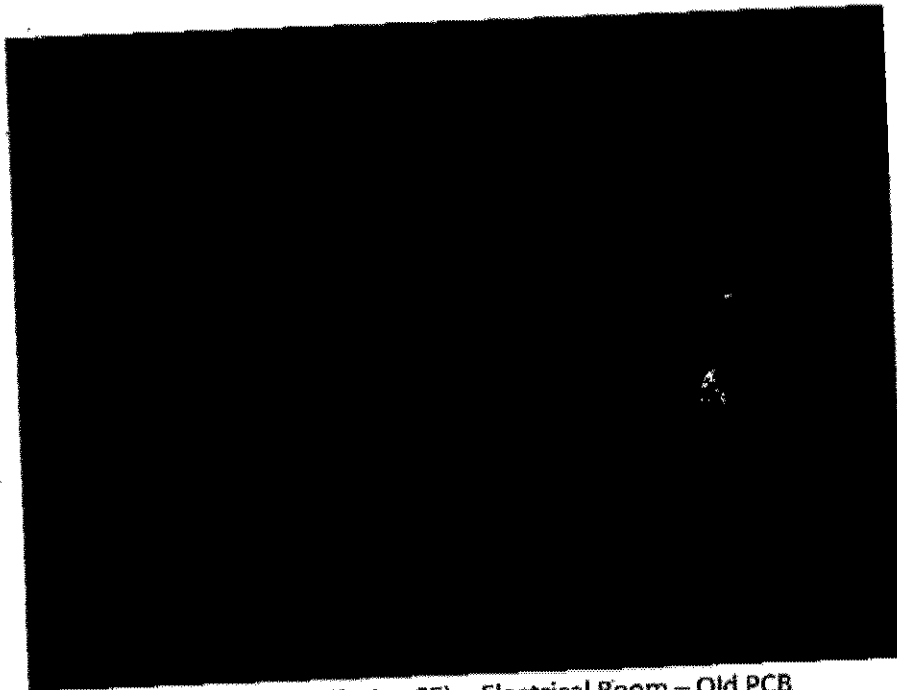


PHOTO 41, 2/10/2012 (facing SE) – Electrical Room – Old PCB containing transformer to be removed. D. Newsome *[signature]*



PHOTO 42, 2/10/2012 (facing S) – Electrical Room – Old PCB containing transformer unit to be removed and area where old unit that was removed was located. D. Newsome *[signature]*

U-Pick-It, Kansas City, MO



PHOTO 43, 2/10/2012 (facing SE) – Electrical Room – Area where old PCB containing transformer was removed located next to the transformer unit to be removed. D. Newsome *DN*

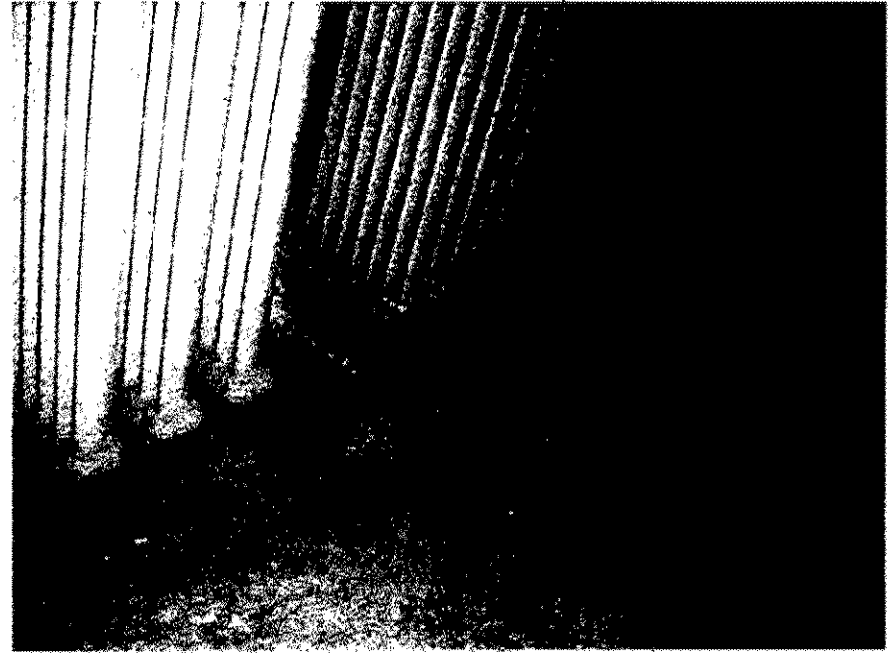


PHOTO 44, 2/10/2012 (facing SE) – Electrical Room – Old PCB containing transformer unit to be removed with close-up of catch pan. D. Newsome *DN*

U-Pick-It, Kansas City, MO



PHOTO 45, 2/10/2012 (facing SW) – Core Return Area – Tote where used oil is accumulated including the used oil generated from household do-it-yourselfers. D. Newsome *DN*

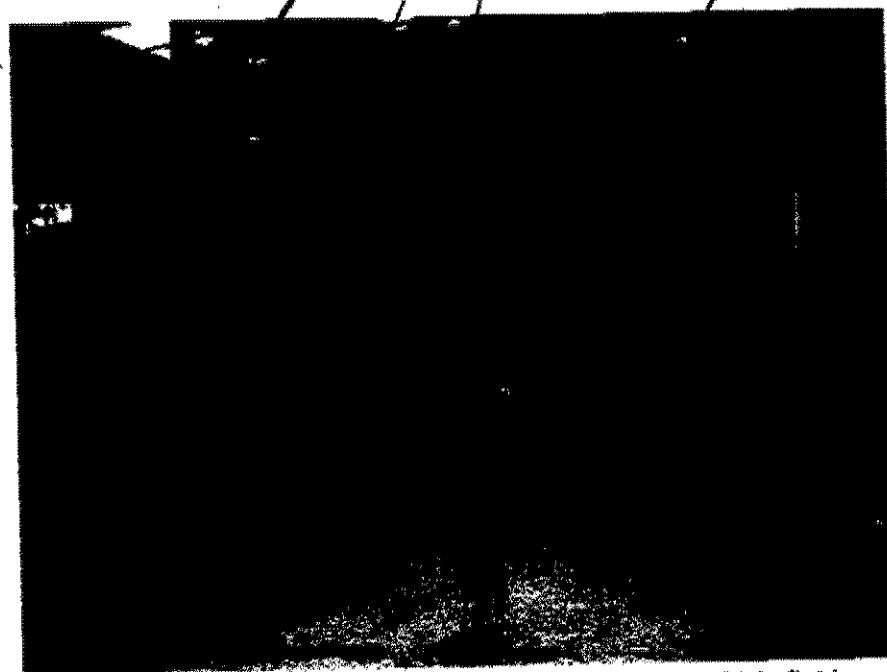


PHOTO 46, 2/10/2012 (facing SW) – Rack Area where vehicle fluids (gasoline, diesel, oil, antifreeze, transmission fluid) are drained. Thick layer of contaminated floor dry on floor. D. Newsome *DN*

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PHOTO 47, 2/10/2012 (facing NW) – Pop Hood Area – Area where vehicle fluids are pumped out including power steering, brake fluid, and windshield wiper fluid. Also, tire lug nuts are loosened and trash, batteries and mercury switches are removed. Two piles of trash to be added into a crushed car for disposal. D. Newsome



PHOTO 48, 2/10/2012 (facing NE) – Area on South Side of Site at Customer Entrance (see attachment 8C for photo location) – Apparent oil stains observed on the concrete ground under yellow engine hoist leading to drain located behind concrete barriers. Close-ups shown in photos 49 and 50. D. Newsome

U-Pick-It, Kansas City, MO



PHOTO 49, 2/10/2012 (facing W) – Area on South Side of Site at Customer Entrance (see attachment 8C for photo location) – Apparent oil stains observed on the concrete ground leading from engine heist area shown in photo 48 to drain located behind concrete barriers. D. Newsome

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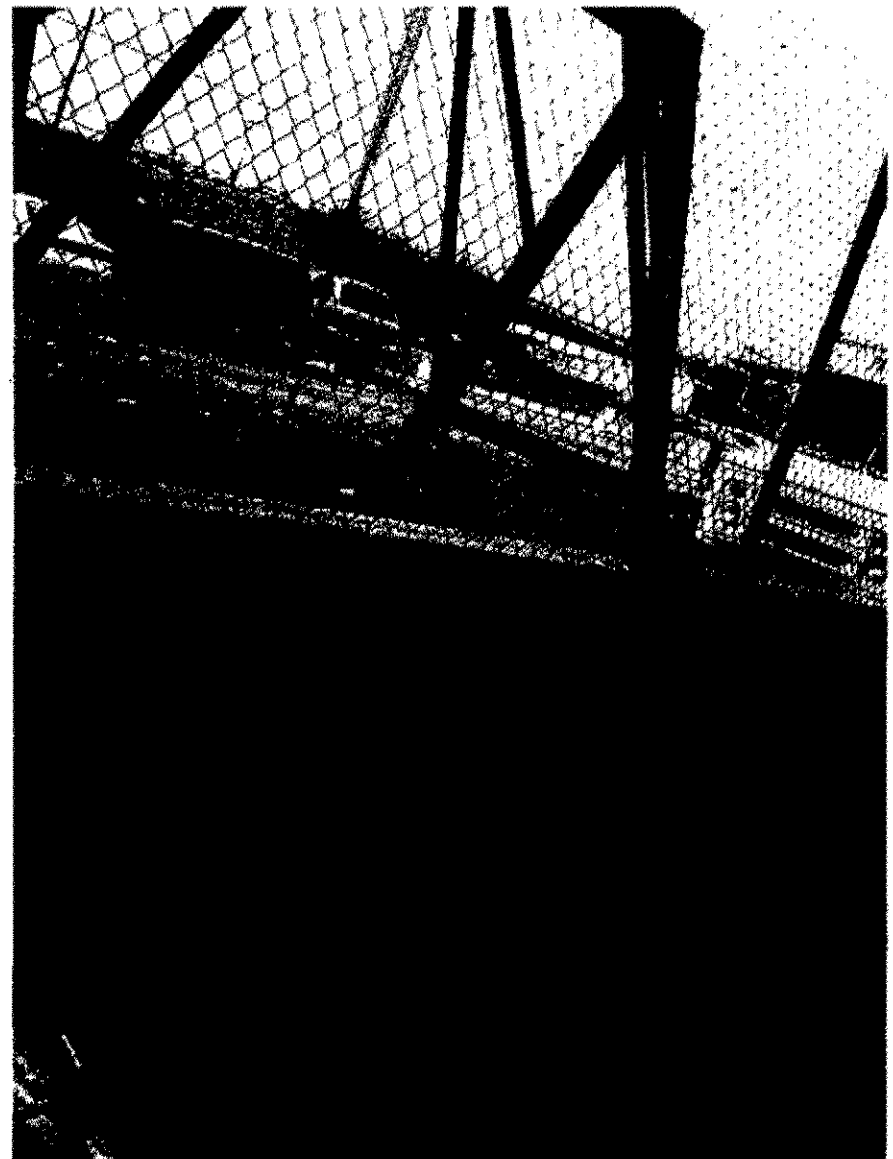


PHOTO 50, 2/10/2012 (facing SW) – Area on South Side of Site at Customer Entrance (see attachment 8C for photo location) – Apparent oil stains observed on the concrete ground under yellow engine heist leading to drain located behind concrete barriers shown in photos 48 and 49. D. Newsome

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U-Pick-It, Kansas City, MO



PHOTO 51, 2/10/2012 (facing NE) – Yard Office – 1-gallon tub of mercury ampules on file cabinet and desk where ampules are removed from switches without containment. D. Newsome